

INSPECTION REPORT

for

RCRA Subtitle C

at

MEADWESTVACO CORPORATION

Fine Papers Division

300 Pratt Street

Luke, MD 21540-1099

MDD000218669

Inspection Date

November 6, 2002

Kenneth J. Cox
Waste and Chemicals Management Division
November 26, 2002

Westvaco Corporation
300 Pratt Street
Luke, MD 21540-1099
(301) - 359 - 3311

SIC Code: 2621

MDD000218669

Inspectors: Kenneth J. Cox, EPA Region III, RCRA Compliance and Enforcement Branch
(Philadelphia, PA Office) (215) - 814 - 3441

Clark Conover, RCRA Compliance and Enforcement Branch (Wheeling, WV Office)
(301)- 231 - 0502

Facility Representatives:

George H. Shoemaker, Environmental Manager (301) - 359 - 3311, Ext. 3356

Ronald E. Paugh, Group Leader (301) - 359 - 3311, Ext. 3262

J. Thomas Martin, Environmental Engineer, (301) - 359 - 3311, Ext. 3446

Tami Smith, Environmental Engineer, (301) - 359 -3311

On November 6, 2002, The Environmental Protection Agency (EPA), RCRA Compliance and Enforcement Branch conducted an unannounced Compliance Evaluation Inspection under the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6901 et seq. and under the Code of Maryland Annotated Regulations ("COMAR") at the Westvaco (now MeadWestvaco) paper mill in Luke, MD.

The inspection team entered the facility at 9:00 and were escorted to a conference room where the facility representatives gathered for an entrance conference. The inspectors identified themselves, presented their EPA credentials, and explained the purpose of the our visit was to conduct a RCRA compliance inspection.

All information included in this report is the result of statements by Westvaco representatives, direct observations, documents supplied by the facility, and review of EPA file materia.

BACKGROUND

Westvaco an integrated pulp and paper mill located in a valley along the north branch of the Potomac River. Because of the meandering river, the mill is located in three counties in two states, Allegany and Garrett in Maryland and Mineral County in West Virginia. This situation has caused the facility to apply for additional ID numbers for non contiguous parts of the mill. Those numbers in addition to the main mill number are: MD00009333564 for the Finished Products Warehouse on Mc Coole, MD, MDD089949283 for a now close and reclaimed strip mine in Luke, MD, WVD980830103 for the Beryl Wood Yard in Beryl, WV, and WV0000923219 for the Piedmont Receiving and Training Center in Piedmont, WV. Individual inspections were conducted at each location.

Westvaco utilizes the Kraft pulping process to manufacture 1,200 tons of high quality paper a day. Typical uses for this paper in for magazine and books where high quality pictures and print are required. The mill employees 1400 people and operates 24 hours a day, 365 days a year.

WASTE GENERATION

Westvaco generates a large amount of waste, most of which is nonhazardous.

1. Lime mud (when the kiln is not in operation), grits and dregs from the pulping liquor regeneration process are shipped to strip mines for reclamation.
2. Raw turpentine (pine tar) and soap (foam) are sent to Westvaco's Chemical Divisions as feedstock.
3. Bark from the debarking operation goes to Kingsford Charcoal as feedstock
4. Wastewater is sent to the Upper Potomac River Commission for treatment where makes up 98% of the POTW flow.
5. Parts washer (34 in all) are either non hazardous units managed by Saftey-Kleen or Crystal Clean.

HAZARDOUS WASTE GENERATION

Hazardous waste is not generated in large volumes given the size of the facility. The Kraft paper making process itself has no hazardous waste stream unless there is a release from the continuous enclosed system, and then it is usually a D002 waste that can be easily neutralized. Hazardous waste is generated from the following waste streams:

1. Clean out and tank bottom are tested and managed and disposed of appropriately.
2. Mercury from monometers that are taken out of service is managed under satellite accumulation in the laboratory where they are taken to be decommissioned.
3. Laboratory wastes are generated in lab packs.
4. QA solvent waste from the print shop clean up where paper quality is tested.
5. Bulbs and batteries are managed as universal wastes.
6. Used oil is generated throughout the facility and is managed under used oil regulations.
7. Parts washer are serviced by Safety-Kleen about every 8 weeks. Currently the facility is in the process of changing to either non hazardous solvents or hazardous solvent that are reusable as provided by Heritage Crystal Clean.

Based on the volume of waste shipped over the last five years, Westvaco is a large quantity generator under the Maryland regulations.

OBSERVATIONS DURING FACILITY TOUR

The facility has a large onsite laboratory to do analysis for the mill and its processes. No wastes were in storage at the time since most of the wastes from the analysis are poured down the drain. Outdated chemicals are lab packed for disposal. The lab is also the location where mercury is generated and stored under satellite accumulation rules. Process control monometers from all over the mill are brought to the lab to have the mercury removed prior to disposal as solid waste. The mercury was stored in a closed labeled container along with other mercury contaminated debris (See Photo #1).

Waste oil is brought from throughout the mill in drums (See Photo #2) to be pumped into a 2000 gallon tank (See Photo #3) that is managed by the Lubrication Department. Several drums located around the tank were open and unlabeled (See Photo 4 & 5).

The Roll Grinding Shop is one of the three designated hazardous waste storage area. No

wastes were in storage at the time of the visit. The grinding process itself generates no hazardous waste, rather it comes from collateral operations.

The Paint Shop generates hazardous paint wastes which is managed under satellite rules (See Photo # 6). One 30 gallon drum was marked used paint and was half full. Another 55 gallon drum was about 2/3 full and was marked Varsol. A parts washer was also located in the paint shop (See Photo #7).

Building 8 & 9 houses the print shop where QA/QC test printing is done on the paper produced in the mill (See Photo 9). Toluene and Naptha solvent are used to clean the printing machines. The waste solvents are taken daily to a designated 90 day storage area in the building. A polly storage cabinet housed the waste (See Photo #8). A spill kit was also in the cabinet. The waste in the cabinet was dated 9/22/02.

The third 90 day hazardous waste storage area is at the Savage Yard. This yard is used for maintenance supplies and used parts storage and is located at the extreme western end of the mill across a public road. The designated hazardous waste storage area is in a large prefabricated Armco Storage Building. This facility was originally constructed for PCB cleanup and disposal work in the early 1980s. Today it is occasionally used to store spills that may occur in the mill. No waste was in storage during the inspection.

FILE REVIEW

A file review was done of the mill's records and the following observations were made:

The training program is extensive at the mill covering a range of topics. Usually hazardous waste training occurs for everyone in January. Those that actually manage hazardous waste get in-depth training yearly. Training records documented training and job descriptions were adequate (See Attachment 1).

Inspections of the 90 day storage areas and satellite area are inspected weekly by the environmental staff and a record of each inspection is kept (See Attachment 2).

Five years worth of manifests were reviewed. No violations were observed. (See Attachment 3).

A large facility contingency plan was reviewed and no problems were identified. A portion of the plan is in Attachment 4.

The facility's most recent biennial report is Attachment 5.

PHOTOGRAPHIC LOG

1. Mercury storage container
2. Used oil containers in storage
3. Used oil storage tank
4. Open and unlabeled container of used oil
5. Open and unlabeled container of used oil
6. Satellite storage of paint wastes
7. Parts washer in paint shop
8. 90 day storage cabinet in paper mill
9. Printer used to test paper quality
10. Armco storage building

EPA GENERATORS CHECKLIST

Name of Facility: *Westvaco Paper Mill (New Mead Westvaco)*
Address: *300 Pratt Street*
Luke, MD 21540
Geo Coordinates

EPA ID#: *MDD00218669*
Name/Title of
Facility Rep: *George Shoemaker*
Env. Manager

I. General:

1. Provide a brief description of the type of operation(s) that produce hazardous waste at this facility: *Lab/QC/Maintenance*

2. Does the facility perform the following on-site:

- a. Storage (greater than 90 days) of hazardous waste: Yes ☒ No
- b. Treatment of hazardous waste: Yes ☒ No
- c. Disposal of hazardous waste: Yes ☒ No

If yes, complete appropriate TSD checklists.

List the maximum amount of each type of hazardous waste generated on a monthly basis and the amount accumulated on-site at the time of the inspection.

<u>Waste Code</u>	<u>Amount Generated</u>	<u>Amount Accumulated</u>
<i>F005/D039</i>		

3. Is the facility subject to any exclusions for it's hazardous waste: Yes ☒ No
If yes, list waste and basis for exclusion.

4. Waste Minimization: What has been done facility wide to reduce the volume and or toxicity of the waste generated? *Non hazardous parts washers*

5. Does the facility generate any characteristic hazardous waste? ☒ Yes ☐ No
If yes, describe how these characteristics were determined, i.e.

testing or knowledge process/material used.

6. Does the facility contemplate any changes in its operation from a hazardous waste generation or management perspective? Yes No

If yes, describe:

Further decrease in parts washer waste

II. Manifest (Complete this section only if facility ships hazardous waste off-site)

262.20(a)

1. Does this facility use the Uniform Hazardous Waste Manifest? Yes No

If no, describe system used.

If yes, review a representative number of manifests and indicate whether they contain:

- a. Generator's name, mailing address, telephone number and EPA ID number? Yes No
- b. Transporter's name and EPA ID number? Yes No
- c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification number? Yes No
- d. Number and type of containers (if applicable)? Yes No
- e. Quantity of each waste transported? Yes No
- f. Name, EPA ID number and site address of facility designated to receive the waste? Yes No
- g. The following certification? Yes No

"I hereby declare that the contents of this consignment are full and accurately described above by proper shipping name and are classified, packaged, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the

method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment.”

262.23(a)

2. Did the generator:

- a. Sign and date the manifest? ☒ Yes ☐ No
- b. Obtain the handwritten signature and date of acceptance from the initial transporter? ☒ Yes ☐ No
- c. Ensure that return copies of the manifest from the TSD facility were properly signed and dated? ☒ Yes ☐ No
- d. Retain a copy of the signed manifest for at least three years? ☒ Yes ☐ No

(The inspector should obtain copies of any manifests that are found to have problems)

III. Pre-Transport Requirements

Manifest System: (Complete only if the facility ships hazardous waste off-site)

1. Identify the name and address of off-site facilities which have received waste from this generator.

Name: *Safety-Kleen*

Addr:

Phn:

ID#:

2. Is there any indication that the facility is:

262.30

- a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)? Yes ☒ No

262.31

- b. Not labeling each package in accordance with DOT regulations (49 CFR Part 172)? Yes ☒ No

262.32 (a) & (b)

- c. Not marking each container of 110 gallons or less with the words

"hazardous waste -----" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? Yes ☒ No
If yes, explain:

262.33

3. Does the facility placard or offer the transporter placards for its hazardous waste shipments? Yes ☒ No

IV. Waste Accumulation

1. Does the facility utilize the following types of hazardous waste accumulation:

a. Satellite accumulation? Yes ☒ No

b. Less than 90 day storage? Yes ☒ No

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c)(1)

2. Is satellite accumulation area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? Yes ☒ No

If no, describe:

262.34(c)(1)

3. Are there multiple satellite accumulation areas for any one process that generate hazardous waste? Yes ☒ No

If yes, describe:

262.34(c)(1)

4. Is the waste stored in container(s)? Yes ☒ No

265.171

5. Are container(s) in good condition? Yes ☒ No

If no, explain:

262.34(c)(1)(ii)

6. Are container(s) marked with the words "hazardous waste" or with other words identifying the contents? Yes ☒ No

265.173(a)

7. Are container(s) kept closed? Yes ☒ No

265.171

8. Are any container(s) leaking? Yes ☒ No

If yes, describe:

262.34(c)(1)

9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? Yes ☒ No

If yes, answer the following questions.

a. Are the container(s) holding excess waste dated as to when accumulation began? Yes No

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such excess waste began? Yes No

Answer the following questions if the facility has less than 90 day storage.

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? ☒ Yes ☒ No

If yes, do these records include:

265.16(d)(1) [as referenced by 262.34 (a)(4)]

a. Job title for each person related to hazardous waste management and the employee filling each job? ☒ Yes ☒ No

265.16(d)(2)

b. A written job description for each position? ☒ Yes ☒ No

265.16(d)(3)

c. A written description of the type and amount of training that will be given to each person? ☒ Yes ☒ No

265.16(d)(4)

d. Documentation that the training or job experience required by facility personnel to effectively respond to emergencies and other wise manage hazardous waste in a proper manner has been successfully completed? ☒ Yes ☒ No

265.16(b)

11. Have facility personnel successfully completed the required training or job

experience within six months after occupying the position. ☒ Yes ☐ No

265.16(c)

12. Do facility personnel take part in an annual review of initial training requirements and update them as necessary? ☒ Yes ☐ No

262.34(a)(4)

13. Does the facility maintain an adequate preparedness and prevention program as required in 40 CFR265 Subpart C? ☒ Yes ☐ No

Is the facility equipped with:

265.32(a)

a. Internal communications or alarm system? ☒ Yes ☐ No

265.32(b)

b. Telephone or hand-held two way radio? ☒ Yes ☐ No

265.3(c)

c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No

265.32(d)

d. Adequate volume of water? ☒ Yes ☐ No

265.33

14. Does the facility maintain the above equipment to assure its proper operation? ☒ Yes ☐ No

265.35

15. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment to areas where hazardous waste are located in the event of emergency? ☒ Yes ☐ No

265.37(a)(1)

16. Has the facility made arrangements with local authorities to familiarize them with the layout of the facility and the nature/hazards of the hazardous waste handled at the facility? ☒ Yes ☐ No

262.34(a)(4)

17. Has the facility prepared a contingency plan and is it maintained at the facility? ☒ Yes ☐ No

If yes, does it contain the following:

- a. Description of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? ☒ Yes ☐ No
- b. Description of arrangements made with local authorities? ☒ Yes ☐ No
- c. Current list of emergency coordinators names, addresses and phone numbers (office and home)? ☒ Yes ☐ No
- d. List of all emergency equipment at the facility, including locations, descriptions and relevant capabilities? ☒ Yes ☐ No
- e. Evacuation plan for facility personnel? ☒ Yes ☐ No

The inspector should obtain a copy of the facility's contingency plan if problems are found.

265.53(b)

18. Were copies of contingency plan presented to local authorities that may provide emergency services? ☒ Yes ☐ No

19. Has the facilities contingency ever failed in an emergency? Yes ☒ No ☐ N/A

If yes:

265.54(b)

a. Was the contingency plan immediately amended?

265.56(j)

20. If the contingency plan is implemented, does the facility record the incident in its operating log and submit a written report of the incident to the appropriate state agency? ☒ Yes ☐ No ☐ N/A

262.34(a)(1):

21. What is the method of waste storage:

Containers? ☒ Yes ☐ No

Tanks? Yes ☒ No

Other? Yes ☐ No **If yes, describe:**

262.34(a)(2)&(3)

22. Are the container(s) marked with the words "Hazardous Waste" and the date that was accumulation in that container begins? ☒ Yes ☐ No

262.34(a)

23. Based upon accumulation dates, have any container(s) been in storage more than 90 days? Yes ☒ No

If yes, inspector should complete the appropriate TSD checklists.

265.171

24. Are container(s) in good condition? ☒ Yes No

If no, explain:

265.172

25. Are containers made out of or lined with materials which will not react with or be incompatible with the wastes they are storing? ☒ Yes No

265.173(a)

26. Are containers kept closed? ☒ Yes No

265.171

27. Are any container(s) leaking? Yes ☒ No

If yes, describe:

265.174

28. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained? ☒ Yes No

If no, explain:

265.35

29. Is adequate aisle space maintained? ☒ Yes No

If no, explain:

265.176

30. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? ☒ Yes No N/A

31. Are incompatible wastes placed in the same container(s)? Yes ☒ No

If yes, explain:

265.177(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred. Yes No

If yes, describe:

265.177(c)

32. Are container(s) holding incompatible hazardous wastes properly separated or protected from one another while in storage. Yes No N/A

Answer the following questions if the facility uses tank storage.

262.34(a)(3)

33. Is the tank(s) labeled or clearly marked with the words "Hazardous Waste"? Yes No

262.34(a)

34. Is the tank(s) marked with the date that waste accumulation begins in the tank(s) or does the facility have in its records when waste accumulation started in the tank(s)?
Yes No

262.34(a)

35. Based upon accumulation dates, has the facility stored hazardous waste in its tank(s) for more than 90 days? Yes No

If yes, the inspector should complete the appropriate TSD checklists.

36. Which of the following describes the tank(s) employed at this facility (highlight or circle appropriate response(s))?

- a. Indoor - not on impermeable floor
- b. Indoor - on impermeable floor
- c. Outdoor - above ground
- d. Outdoor - in ground
- e. Outdoor - underground

37. What is the approximately age of the tank(s)?

265.191

38. Does the tank(s) appear to be in good condition? Yes No

If no, describe:

265.191

39. Is the tank(s) leaking? Yes No

If yes, describe:

265.193

40. Is the tank(s) provided with an effective secondary containment system? Yes No

265.191(b)

41. Was a leak test performed on the tank(s)? Yes No

265.194(b)

42. Is the tank(s) provided with adequate controls to prevent spills or overflows (i.e., automatic feed cutoff, bypass to another unit, high level alarms, etc.) Yes No

265.194(b)

43. Is there sufficient freeboard (2 feet) in uncovered tank(s) to prevent overtopping by wave or wind action or precipitation? Yes No N/A

265.195(a)

44. Is tank(s) inspected each operating day? Yes No

If yes, do inspections include:

265.195(a)(1)

a. Overfill/spill control equipment? Yes No N/A

265.195(a)(2)

b. Above ground portions of the tank(s) for corrosion or releases? Yes No

265.195(a)(3)

c. Data gathered from monitoring equipment and leak detection equipment?
Yes No

265.195(a)(4)

d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion and releases? Yes No

265.195(b)(4)

45. Does this facility perform annual inspections of the cathodic protection system, if present. Yes No N/A

265.195(c)

46. Does the facility properly document all of the results of its tank system inspections?
Yes No

265.196

47. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank(s) from service immediately, failure to provide notification, etc.)? Yes No

If yes, describe:

48. Does the facility store any ignitable or reactive waste in its tank(s). Yes No

If yes:

265.198(a)(1)

- a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? Yes No

265.198(a)(2)

- b. Is the waste stored in such a way that it is protected from any material or condition that may cause the waste to ignite or react? Yes No

265.198(a)(3)

- c. Is the tank(s) used solely for emergencies? Yes No

265.198(b)

- d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares? Yes No

If no, describe:

49. Is there any indication that incompatible wastes are being stored in a tank(s)? Yes No

V. Record Keeping and Reports

262.42(a)(2)

1. Does the facility prepare an Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was accepted by the initial transporter? Yes No

If yes:

- a. Legible copy of the manifest? Yes No

- b. Cover letter explaining generators efforts to locate waste and the results of those efforts? ☒ Yes ☐ No

262.41(a)

2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by march 1 of each even numbered year.

☒ Yes ☐ No ☐ N/A

If yes, does the Biennial Report include:

262.41(a)(3)

- a. Name, address and EPA ID number for each off-site TSD facility to which waste was shipped during the year? ☒ Yes ☐ No

262.41(a)(4)

- b. Name and EPA ID number of each transporter used during the year? ☒ Yes ☐ No

262.41(a)(5)

- c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which it was shipped)? ☒ Yes ☐ No

262.41(a)(6)

- d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated? ☒ Yes ☐ No

262.41(a)(7)

- e. Description of the changes in volume and toxicity of the waste actually achieved during the year? ☒ Yes ☐ No

262.40(a)(b)(c)

3. Does the facility retain copies of Biennial Reports, Exception reports and test results/waste analyses for a minimum of three years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal? ☒ Yes ☐ No

Additional Comments:

Inspector's Name: *Kenneth J. Cox*
Title: *Environmental Engineer*
Agency: *EPA R3*
Office Location: *1650 Arch St., Phila, PA 19103*
Date of Inspection: *11/6/02*

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

2001 Hazardous Waste Report

**FORM
OI****OFF-SITE
IDENTIFICATION****Instructions: Please read the detailed instructions on the reverse side before completing this form.**

Site 1	A. EPA ID No. of off-site installation or transporter KYD053348108	B. Name of off-site installation or transporter Safety-Kleen	
	C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR facility	D. Address of off-site installation Street 3700 Lagrange Road City Smithfield Zip 40068- State KY	
Site 2	A. EPA ID No. of off-site installation or transporter MDD980554653	B. Name of off-site installation or transporter Safety-Kleen	
	C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR facility	D. Address of off-site installation Street 3527 Whiskey Bottom Road City Laurel Zip 20724- State MD	
Site 3	A. EPA ID No. of off-site installation or transporter PAD987367216	B. Name of off-site installation or transporter AERC.COM Inc	
	C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR facility	D. Address of off-site installation Street 2591 Mitchekk Ave City Allentown Zip 18103-6609 State PA	
Site 4	A. EPA ID No. of off-site installation or transporter PAD981736143	B. Name of off-site installation or transporter Safety-Kleen	
	C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR facility	D. Address of off-site installation Street 150 Allenbill Drive City Johnstown Zip 15904- State PA	
Site 5	A. EPA ID No. of off-site installation or transporter ILD984908202	B. Name of off-site installation or transporter Safety-Kleen Corporation	
	C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR facility	D. Address of off-site installation Street NA City Zip State	

Comments:

Job Title: Environmental Engineer Date: 4-15-98
 Division: Fine Papers Location: Luke, Maryland Dept: _____
 Supervisor Title: Environmental Manager Grade: 6

I. Summary Description

The Environmental Engineer is an intermediate level position in the Environmental Services group who works towards assuring the mill's continued compliance with existing environmental regulations. The individual supervises sampling, testing, and reporting of various environmental parameters. The individual does reporting, permit application preparation, record retention, and interacts with various regulators and suppliers.

II. Essential Functions/Responsibilities

		Percent of Time
1	Supervise mandated sampling, testing, and reporting of certain parameters of water and waste water, and air emissions, including the dioxin/AOX sampling program.	25
2	Supervise waste disposal system, manifesting, records keeping, stormwater management program, and mill clarifier operation.	25
3	Interface/deal with suppliers - regulatory inspectors, operating personnel.	10
4	Supervise mandated training (environmental) of mill employees.	10
	Assist other group members with various projects as needed.	10
6	Supervise QA/QC and maintenance of various lab testing equipment.	10
7	Achieve growth through expertise, training, conferences, seminars, courses, etc.	10

III. Educational Requirements

A Bachelor of Science degree in Engineering or an appropriate technical degree.

IV. Experience Requirements

Job Experience	Number of Years
On-the-job training as is necessary to attain proper level of expertise, or appropriate outside experience.	

Organizational Responsibilities

Number of Employees Supervised

Hourly N/A

Salaried Non-Exempt N/A

Salaried Exempt N/A

Employees Supervised Directly			
Title	Emp. Type	Count of Incumbents	Grade Level

Accountability for Profits, Sales, Budgets, Purchases, etc. (quantify responsibility if possible)

The Environmental Engineer will be involved in purchases of certain goods and services, either directly or indirectly, that he will recommend certain purchases are necessary, some recommendations can result in major capital purchases.

Internal Contacts

The Environmental Engineer frequently works with Tech. Service project engineers, Environmental Services Supervisors, engineers, and technicians. He also works with production, design engineering, and administrative personnel at times. He will occasionally be required to deal with Corporate Legal and Environmental personnel.

External Contacts

The Environmental Engineer will work with suppliers of materials and services, as well as certain regulatory inspectors; May occasionally be asked to make environmental presentations to certain groups.

VI. Competencies Required

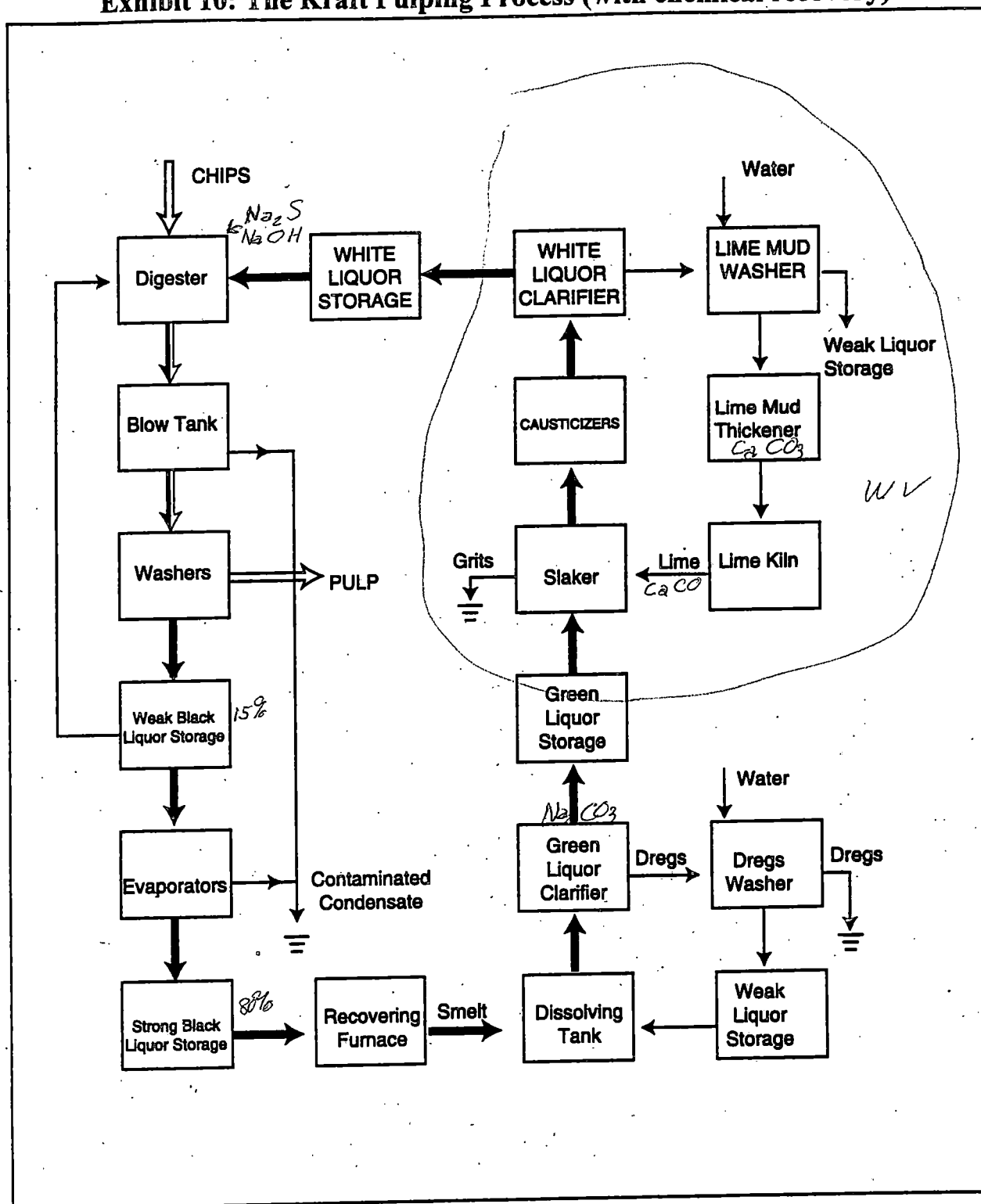
This individual will be able to perform required laboratory testing, perform necessary sampling of air and water emissions and effluents. The individual should be able to use computers effectively to perform prescribed tasks. The person should have the capacity to obtain certain certifications and licenses as necessary to complete tasks required to assure the mill's continued compliance with existing environmental regulations.

Employee Signature/Date

Supervisor's Signature/Date

Incumbent(s) Name (printed):

Exhibit 10: The Kraft Pulping Process (with chemical recovery)



(Source: Smook, G.A. *Handbook for Pulp & Paper Technologists*. Second Edition. Vancouver: Angus Wilde Publications, 1992.)

INITIALS: EWM

WEEKLY INSPECTION LOG

90 DAY STORAGE	8 & 9	ARMCO	ROLL FINISHING	FLUORESCENT BULBS
1) ARE CONTAINERS OR CONTAINMENT AREA LEAKING?	<u>N</u>		<u>N/A</u>	<u>N/A</u>
2) ARE DRUMS/BOXES PROPERLY LABELED, INCLUDING ACCUMULATION DATE, IDENTITY AND NOTICE? <u>4-22-02</u>	<u>✓</u>		<u>-</u>	<u>✓</u>
3) IS CONTAINMENT AREA: - PROPERLY MARKED? - CLEAR ACCESS? - CLEANUP MATERIALS PRESENT?	<u>✓</u> <u>✓</u> <u>✓</u>		<u>-</u> <u>-</u> <u>-</u>	<u>✓</u> <u>✓</u> <u>N/A</u>
4) TOTAL BULB COUNT: 4FT / 8 FT	COUNT OF 30 BOXES OR MORE CONTRACT TOM MARTIN			<u>230</u>

SATELLITE STORAGE AREA	TECH SERVICE	MAINT	PAINT SHOP	PIEDMONT MACH SHOP
ARE CONTAINERS:				
- PROPERLY LABELED?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
- GOOD CONDITION?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
- CLOSED?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
SAFE STORAGE AREA?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

BARREL STORAGE AREA

- ARE BARRELS:
- TRIPLED RINSED W/STICKERS? ✓
 - CLOSED? ✓
 - LID FACING COOLING TOWER? ✓
 - STORED WITH BUNGS HORIZONTAL? ✓

SOURCE OF BARRELS IN VIOLATION:

(use check for "yes", N for no)

COMMENTS:

JOHN AMORUSO
BOB AMYOT
ALLEN BRODE

RICHARD HESS
GLENN HOWELL
JERRY KING

TIM NEWLIN
TOM MARTIN
HERB RANKIN

NEAL RIZER
GEORGE SHOEMAKER
NORM SNYDER

PULP MILLTOUR FOREMAN
RICHARD VINCI

DATE: 10-29-02/11-1-02
INITIALS: ATA/JAM

WEEKLY INSPECTION LOG

90 DAY STORAGE	8 & 9	ATA ARMCO	ATA ROLL FINISHING	FLUORESCENT BULBS
1) ARE CONTAINERS OR CONTAINMENT AREA LEAKING?	9/22 K1	N/A	N/A	N/A
2) ARE DRUMS/BOXES PROPERLY LABELED, INCLUDING ACCUMULATION DATE, IDENTITY AND NOTICE?	✓	—	—	✓
3) IS CONTAINMENT AREA:				
- PROPERLY MARKED?	✓	—	—	✓
- CLEAR ACCESS?	✓	—	—	✓
- CLEANUP MATERIALS PRESENT?	✓	—	—	N/A
4) TOTAL BULB COUNT: 4FT / 8 FT		COUNT OF 30 BOXES OR MORE CONTRACT TOM MARTIN		<30

SATELLITE STORAGE AREA	TECH SERVICE	MAINT	PAINT SHOP	PIEDMONT MACH SHOP
ARE CONTAINERS:				
- PROPERLY LABELED?	✓	✓	✓	✓
- GOOD CONDITION?	✓	✓	✓	✓
- CLOSED?	✓	✓	✓	✓
SAFE STORAGE AREA?	✓	✓	✓	✓

BARREL STORAGE AREA

ARE BARRELS:

- TRIPLED RINSED W/STICKERS? ✓
- CLOSED? ✓
- LID FACING COOLING TOWER? ✓
- STORED WITH BUNGS HORIZONTAL? ✓

SOURCE OF BARRELS IN VIOLATION:

(use check for "yes", N for no)

COMMENTS:

JOHN AMORUSO	RICHARD HESS	TIM NEWLIN	NEAL RIZER	PULP MILLTOUR FOREMAN
BOB AMYOT	GLENN HOWELL	TOM MARTIN	GEORGE SHOEMAKER	RICHARD VINCI
ALLEN BRODE	JERRY KING	HERB RANKIN	NORM SNYDER	

4-077-01

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MDD000218669	Manifest Document No. 49542	2. Page 1 of 1	Information within the bold red border is not required by Federal law but may be required by State law.
3. Generator's Name and Mailing Address WESTVACO CORP LUKE MD 300 PRATT ST LUKE MD 21540				A. State Manifest Document Number PAG 410474	
4. Generator's Phone (301) 359-3311				B. State Gen. ID	
5. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC		6. US EPA ID Number SCRO00075150		C. State Trans. ID PA-AH 0172	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (814) 266-4815	
9. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 150 ALLENBILL DRIVE JOHNSTOWN, PA 15904		10. US EPA ID Number PAD981736143		E. State Trans. ID PA-AH	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM				12. Containers	
				No.	Type
a. X WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (ERG#128) 6.7LBS/GAL (D039)				09	DM
b. X WASTE COMPOUNDS, CLEANING LIQUID (MONOETHANOLAMINE) 8 NA1760 PGIII (D006, D008, D018, D027, D039, D040) (ERG#154) 7.9#/G				04	DM
c.					
d.					
13. Total Quantity				14. Unit Wt/Vol	15. Waste No.
207				G	D039
24				G	D006 D008
J. Additional Descriptions for Materials Listed Above L D018 D027 D039 D040				K. Handling Codes for Wastes Listed Above S02 S02	
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. HWH 427 SK02-004459 S.G .78 100% (SOLVENT) S.G. .95 100% (IC) 21849542 MFST R/T#102633213 0000-1920-23					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name XJ Thomas Martin		Signature <i>[Signature]</i>		MONTH DAY YEAR 09 20 02	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name KEVIN DEEST		Signature <i>[Signature]</i>		MONTH DAY YEAR 09 20 02	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		MONTH DAY YEAR	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name LAURA HOOD					
Signature <i>[Signature]</i>		MONTH DAY YEAR 10 09 20 02			

PAG 410474

3

COPY 3 - TSD FACILITY: MAIL TO GENERATOR

MARYLAND DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway Baltimore, Maryland 21224

(410) 631-3344 1-800-633-6101 (within Maryland) <http://www.mde.state.md.us>

HAZARDOUS WASTE PROGRAM

HAZARDOUS WASTE MANIFEST

Form Approved. OMB No. 2050-0039

4-077-01 SKDOT# A: 2016 B: C:

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Di

Manifest Entered
Branch # 1000000000

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

MDD000218669

Manifest Document No.

55233

2. Page 1

Information in the shaded area is not required by Federal law.

3. Generator's Name and Mailing Address

WESTVACO CORP LUKE MD

300 PRATT ST

LUKE

MD 21540

4. Generator's Phone (

301 359-3311

5. Transporter

1. Company Name

6.

US EPA ID Number

SAFETY-KLEEN SYSTEMS, INC

SCR000075150

7. Transporter

2. Company Name

8.

US EPA ID Number

9. Designated Facility Name and Site Address

000658

10.

US EPA ID Number

SAFETY-KLEEN SYSTEMS, INC.

3700 LAGRANGE ROAD

SMITHFIELD

KY 40068

KYD053348108

A. State Manifest Document Number

MDC1008449

B. State Generator's ID

C. State Transporter's ID

HWH 1271004459 DC

D. Transporter's Phone

814 266-4815

E. State Transporter's ID

HWH DC

F. Transporter's Phone

G. State Facility ID

H. Facility's Phone

502 845-2453

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt/Vol

15. Waste No.

a. RQ WASTE FLAMMABLE LIQUIDS, N.O.S.
(TOLUENE & ALIPHATIC HYDROCARBONS)
3 UN1993 PG II (F005)(ERG#128)

001 DM

00343

P

F005

J. Additional Descriptions for Materials Listed Above

Haz. Code 0001

Physical State L

Specific Gravity 1.17

Percentage 100%

Haz. Code

Physical State

Specific Gravity

Percentage

a. 0001 L 1.17 100%

b. 0001 L 1.17 100%

c. 0001 L 1.17 100%

d. 0001 L 1.17 100%

K. Handling Codes for Wastes Listed Above

a. 1001

b. 1001

c. 1001

d. 1001

15. Special Handling Instructions and Additional Information

MFST R/T#102343144 0000-1920-23

EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.

M001355233

16. GENERATORS CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulation.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

XJ Thomas Martin

XJ Thomas Martin for Westvaco

09/2000

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

KEVIN DEIST

[Signature]

Month Day Year

09/2000

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Date

[Signature]

[Signature]

Month Day Year

09/2000

In case of an emergency or spill, immediately call the National Response Center at (800) 424-8802 and the MDE at (410) 631-3400. Nights and Holidays at (410) 974-3551.

MARYLAND DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway Baltimore, Maryland 21224

(410) 631-3344 1-800-633-6101 (within Maryland) <http://www.mde.state.md.us>

HAZARDOUS WASTE PROGRAM

Form Approved, OMB No. 2050-0039.

HAZARDOUS WASTE MANIFEST

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

MDD000218669

Manifest Document No.

54829

2. Page 1

of 2

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address WESTVACO CORP LUKE MD

ATTN TOM MARTIN 300 PRATT ST
LUKE MD 21540

4. Generator's Phone (301) 359-3311

5. Transporter 1. Company Name

SAFETY-KLEEN (TG), INC.

7. Transporter 2. Company Name

9. Designated Facility Name and Site Address 050145

SAFETY-KLEEN (TS), INC.
3527 WHISKEY BOTTOM ROAD
LAUREL MD 20724

6. US EPA ID Number

SCR000074591

8. US EPA ID Number

10. US EPA ID Number

MDD980554653

A. State Manifest Document Number

MDC 0977373

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone

800 669-5840

E. State Transporter's ID

F. Transporter's Phone

G. State Facility ID

A207

H. Facility's Phone

301 939-6000

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. Waste Oxidizing Solid, n.o.s.,
5.1, UN 1479, II (ERG #140)

b. Waste Flammable liquids, n.o.s.,
3, UN 1993, II (ERG #128)

c. Waste Flammable Solids, organic, n.o.s.,
4.1, UN 1325, III (ERG #133)

d. Waste Ammonium Sulfide Solutions,
8 (6.1X3), UN 2683, II (ERG #132)

12. Containers
No. Type

001 DF

000 15

P

001 DF

000 15

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001 DF

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MARYLAND DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway, Baltimore, Maryland 21224

(410) 631-3344 • 1-800-633-6101 (within Maryland) • <http://www.mde.state.md.us>

WVWR1

Please print or type (Form designed for use on 11x17 (12-pitch) typewriter.)

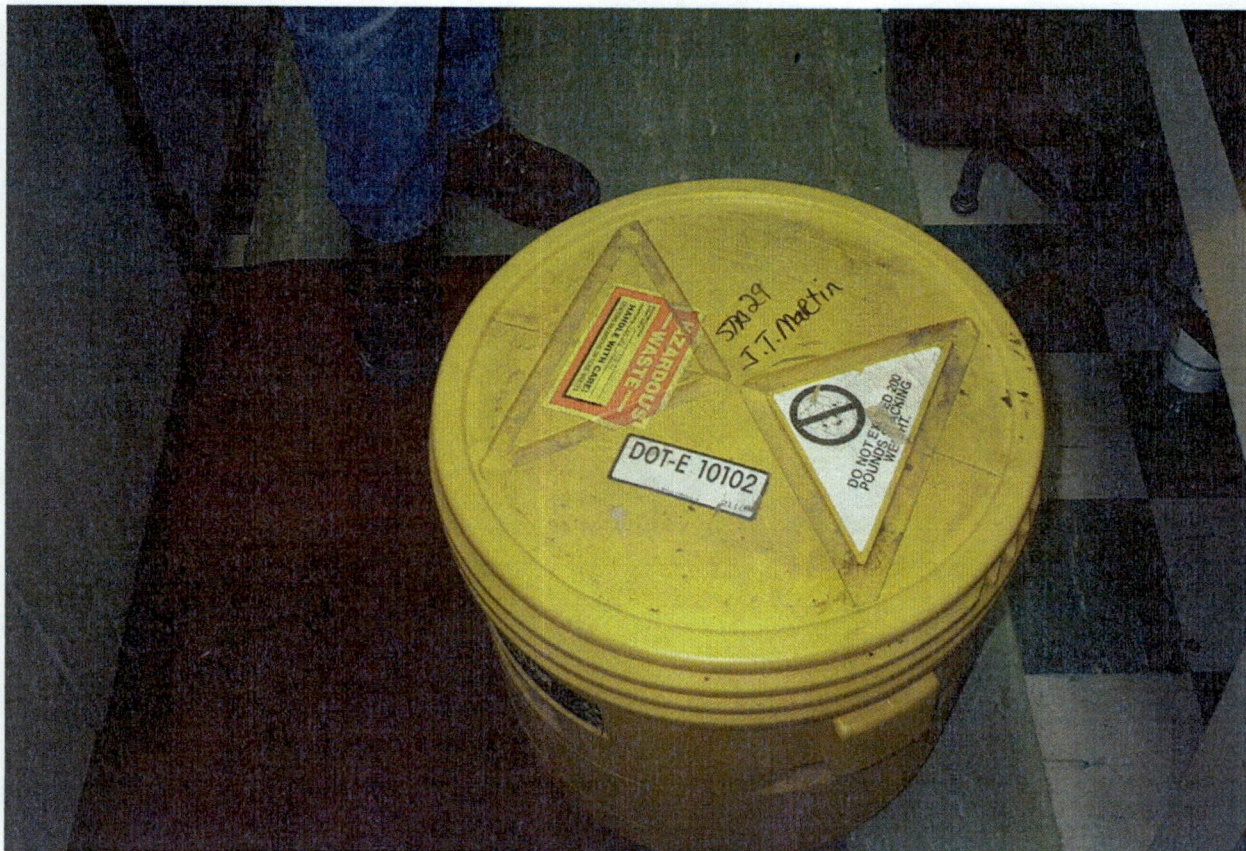
HAZARDOUS WASTE PROGRAM
HAZARDOUS WASTE MANIFEST

Form Approved OMB No. 2060-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MDD 000218669		Manifest Document No. 63164		2. Page 12 of 12	
3. Generator's Name and Mailing Address ATTN TOM MARTIN LUKE WESTVACO CORP LUKE MD 300 PRATT ST MD 21540				A. State Manifest Document Number MDC 0874325			
4. Generator's Phone () 301 359-3311				B. State Generator's ID PAAH0172			
5. Transporter 1 Company Name SAFETY KLEEN SYSTEMS, INC		6. US EPA ID Number SCR 000075150		C. State Transporter's ID PAAH0172		D. Transporter's Phone 814 266-4815	
7. Transporter 2 Company Name SAFETY KLEEN (TS), INC.		8. US EPA ID Number SCR 000074591		E. State Transporter's ID PAAH0271		F. Transporter's Phone 740 928-1617	
9. Designated Facility Name and Site Address SAFETY-KLEEN (TS), INC. 3527 WHISKEY BOTTOM ROAD LAUREL MD 20724				G. State Facility ID A207			
10. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Waste Corrosive liquids, flammable, n.o.s. 8(3), UN2920, II (ERG#132)				H. Facility's Phone 301 939-6000			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. Waste Corrosive liquids, flammable, n.o.s. 8(3), UN2920, II (ERG#132)		No. 1 Type DM		250		P	
b. Waste Toxic Solids, organic, n.o.s., 6.1, UN2811, II (ERG#154) (Potassium Dichromate (Barium) Nitrate)		No. 1 Type DM		200		P	
c. Waste oxidizing solid, toxic, n.o.s., 8, UN3087, II (ERG#141) (Potassium Chromate, Barium Nitrate)		No. 1 Type DM		250		P	
d. Waste Corrosive liquid, basic, organic, n.o.s., 8, UN3267, II (ERG#153)		No. 1 Type DF		50P		D002	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. CL L 0.9 100				a. S			
b. ES 0.9 100				b. S			
c. IE S 0.9 100				c. S			
d. GL L 0.9 100				d. S			
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-468-1760 (24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN SUBSEQUENT CARRIERS TSMT, HZEC, SHND, NADP							
16. GENERATORS CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulation. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name James A Malloy for Westvac				Signature <i>James A Malloy for Westvac</i>			
17. Transporter 1 Acknowledgement of Receipt of Materials				Month Day Year 09/18/00			
Printed/Typed Name Clinton Hayes				Signature <i>Clinton Hayes</i>			
18. Transporter 2 Acknowledgement of Receipt of Materials				Date 09/18/00			
Printed/Typed Name <i>Clinton Hayes</i>				Signature <i>Clinton Hayes</i>			
19. Discrepancy Indication Space				Month Day Year 09/18/00			
SECTION 2 CORRECTED AT SK LAUREL 10-4-00							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.							
Printed/Typed Name ANDREA ISPOR				Signature <i>Andrea Ispor</i>			
Month Day Year 11/01/00				Date 11/01/00			

In case of an emergency or spill, immediately call the National Response Center at (800) 424-8802 and the MDE at (410) 631-3400. Nights and Holidays at (410) 974-3551.

MDC 08/4325



MEADWESTVACO

Luke, Maryland

MDD000218669

Date: November 6, 2002

Photographer: Clark S. Conover

EPA/RIII/Wheeling

Photo#: 1

This photo depicts the mercury contamination storage container located in the Tech. Service Building.



MEADWESTVACO
Luke, Maryland
MDD000218669
Date: November 6, 2002
Photographer: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 2

This photo depicts the used oil storage drums.



MEADWESTVACO

Luke, Maryland

MDD000218669

Date: November 6, 2002

Photographer: Clark S. Conover

EPA/RIII/Wheeling

Photo#: 3

This photo depicts the 2,000 gallon used oil storage tank.



MEADWESTVACO
Luke, Maryland
MDD000218669
Date: November 6, 2002
Photographer: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 4

This photo depicts used oil storage adjacent to the 2,000 gallon used oil storage tank.



MEADWESTVACO

Luke, Maryland

MDD000218669

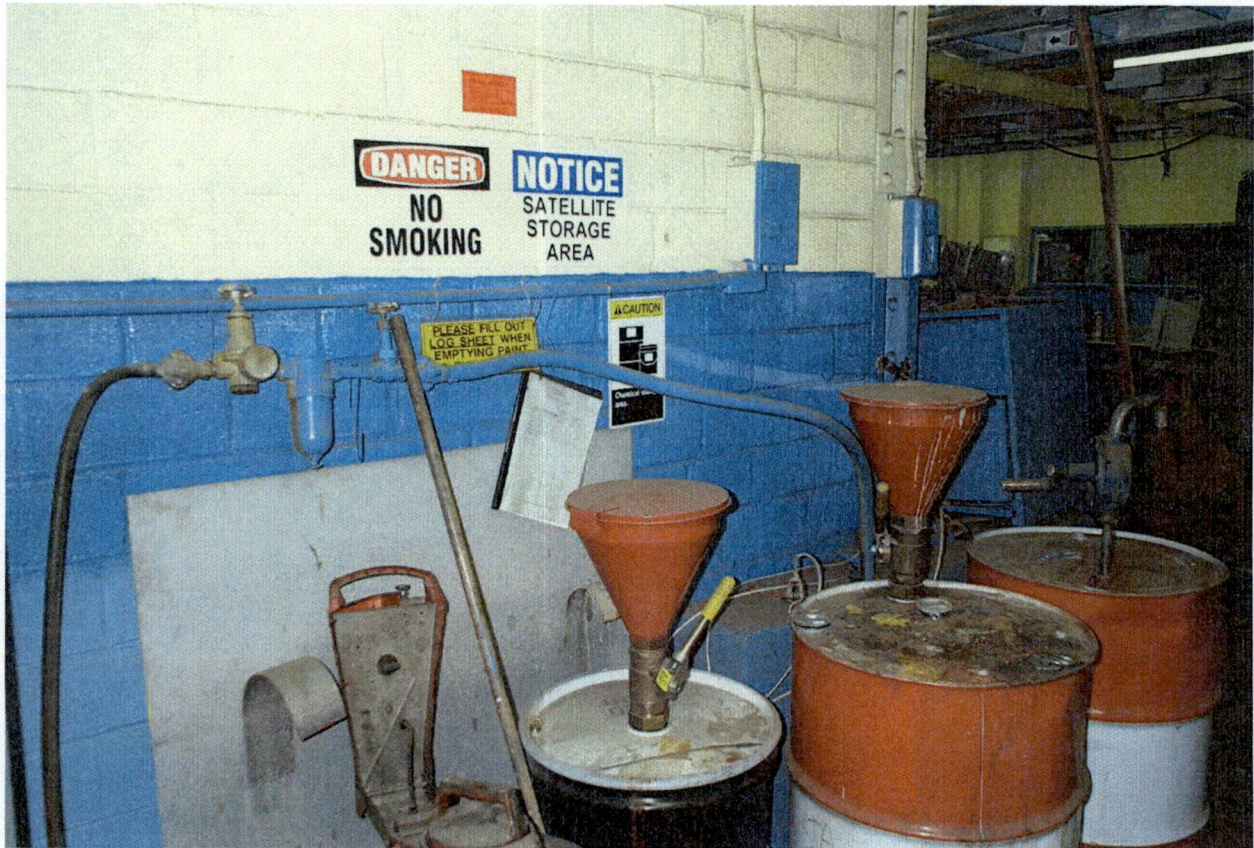
Date: November 6, 2002

Photographer: Clark S. Conover

EPA/RIII/Wheeling

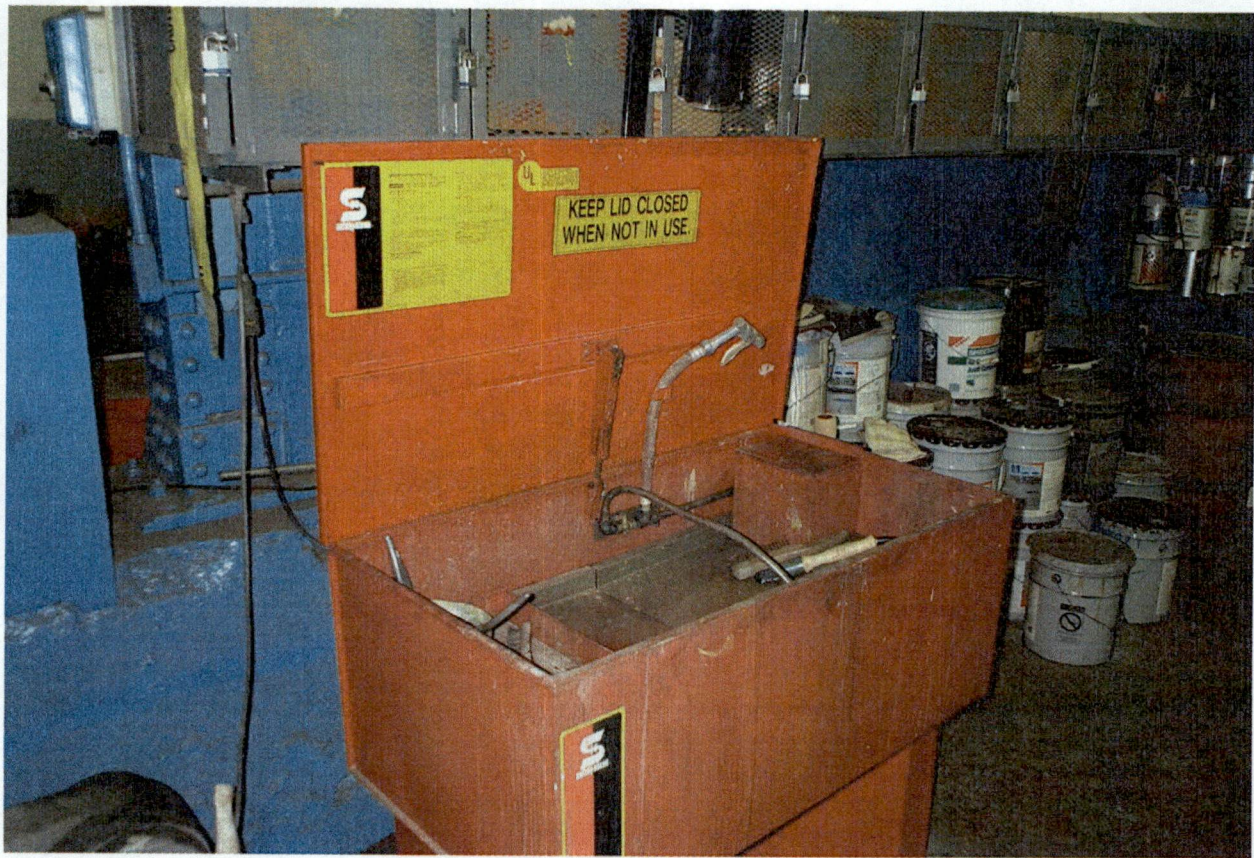
Photo#: 5

This photo depicts the used oil storage in the blue pan.



MEADWESTVACO
Luke, Maryland
MDD000218669
Date: November 6, 2002
Photographer: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 6

This photo depicts a 55 gallon drum for used Varsol, One 30 gallon drum for the collection of used paint, and one 55 gallon drum of solvent product.



MEADWESTVACO
Luke, Maryland
MDD000218669
Date: November 6, 2002
Photographer: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 7

This photo depicts the Safety Kleen parts cleaner in the paint storage area.



MEADWESTVACO
Luke, Maryland
MDD000218669
Date: November 6, 2002
Photographer: Clark S. Conover
EPA/RIII/Wheeling
Photo#: 8

This photo depicts the 90 day storage area located in the Paper machine Building.



MEADWESTVACO

Luke, Maryland

MDD000218669

Date: November 6, 2002

Photographer: Clark S. Conover

EPA/RIII/Wheeling

Photo#: 9

This photo depicts the solvent based ink printer.



MEADWESTVACO

Luke, Maryland

MDD000218669

Date: November 6, 2002

Photographer: Clark S. Conover

EPA/RIII/Wheeling

Photo#: 10

This photo depicts the Armco building maintenance garage. This facility is used for general salvage and as a 90 day storage area.

QUALITY ASSURANCE PLAN

FOR

HAZARDOUS SUBSTANCES & WASTE MANAGEMENT

Westvaco Corporation

Luke, Maryland

Prepared:	1991
Revision 1:	March 1993
Revision 2:	Sept. 1994
Revision 3:	March 1996
Revision 4:	March 1997
Revision 5:	November 1997
Revision 6:	July 1999
Revision 7:	March 2001

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 - G: Weekly Inspection Logs
 - H: Incident Reports
 - I: Yearly Review Checklist
 - J: Waste Minimization Plan

I. INTRODUCTION

1.1. Purpose

This Quality Assurance (QA) plan describes the measures taken by Westvaco Corporation at the Luke mill in reference to generating transportation, storage, and disposal of hazardous substances and wastes. This document contains all of the QA program elements, standard operating procedures and reference documentation for Westvaco's current waste management system.

The purpose of the plan is to insure that Westvaco's waste management efforts take into account all regulatory, environmental, ethical, and economic considerations and implement, to the best of the company's ability (through best engineering practices), this plan. This plan also documents the areas of responsibility, authority, and the lines of communication between parties associated with this program.

Once the plan is approved by Westvaco Corporation, it will become a revision-controlled document. All project personnel will be subject to this document; they will have access to, and demonstrate an understanding of, this plan. Copies of the document will be distributed to the following:

Table I

Location

1. EMS File Cabinet
2. Technical Director's Office
3. 8&9 QA Supervisor's Office
4. Roll Finishing Foreman's Office
5. Maintenance Superintendent's Office
6. Paint Shop Foreman's Office
7. Environmental Services Laboratory
8. Piedmont Machine Shop Foreman's Office
9. Central Maintenance Foreman's Office
10. Surplus Disposal Administrator's Office
11. Safety Kleen Representative

1.2 Project Goals

Westvaco's goal is to safely and capably manage all hazardous substances and wastes covered by this plan. It is the company's intention to accurately record and report all relevant activity to the proper federal and/or state authorities.

1.3 Project Organization and Responsibilities

Westvaco will provide short-term storage and applicable containment for hazardous wastes generated and comply with all regulations that pertain to generators under Code of Maryland Regulations. Westvaco will also comply with the Resource Conservation and Recovery Act (incorporated by reference in Code of Maryland Regulations).

Properly permitted hazardous waste contractors will provide hazardous materials management and related services on a fee-for-service basis. They will arrange for and conduct the packaging, labeling, manifesting, movement, and final disposal for Westvaco's hazardous waste materials. They will comply with all regulations pertaining to transportation, storage, and disposal of hazardous chemicals and wastes. This includes, but is not limited to, Department of Transportation regulations, the Resource Conservation and Recovery Act and Code of Maryland Regulations 26.13.03 - 26.13.05 (Appendix A).

2. HAZARDOUS WASTE MANAGEMENT SYSTEM

2.1 Generator Responsibilities

(a) Federal and State Regulations

Westvaco will comply with the Code of Federal Regulations 40, Part 260-262 and COMAR 26.13.01, .02, .03, .05. Preparation for transportation of the hazardous waste will be carried out in accordance with DOT regulations (CFR 49, Part 171). Westvaco personnel will provide:

- 1) Determination of whether or not a waste is hazardous under 26.13.02, including a written Waste Analysis Plan (26.13.05.02) (Appendix B).
- 2) Record of the determination of a waste's hazardous properties (see files).
- 3) Maintain manifests on all shipments of the hazardous waste in accordance with 26.13.03.04 and retain a copy of each manifest in accordance with 26.13.03.06A(1) and Westvaco Records Retention Policy, whichever is longer.
- 4) Retain a copy of any waste analysis in accordance with 26.13.03.06A(3) (see files).
- 5) Adhere to the Pretransport requirements under Section 26.13.03.05.

- 6) Complete a biennial report consistent with 26.13.03.06(B).
- 7) Obtain an EPA identification No. (26.13.03.03).
- 8) Maintain a contingency Spill Prevention and Counter Measurement Plan (26.13.05.04(G) Appendix C).
- 9) Equipment listing 26.13.05.03C (Appendix D).
- 10) Proper training documentation 26.13.05.02(G) (see EMS file cabinet Section M).

(b) Area Responsibilities

Persons directly in charge of and utilizing the waste storage areas will designate personnel to maintain proper storage containers in compliance with this QA Plan and applicable regulations. Two types of collection areas exist at this facility.

Satellite Accumulation/Storage - A satellite accumulation area will (COMAR 26.13.03.05E):

- 1) Accumulate no more than 55 gallons of hazardous waste (one quart of acutely hazardous waste).
- 2) Permit storage near the point of accumulation for periods longer than 90 days.
- 3) Allow containers that are marked with the words "Hazardous Waste" or that identify the contents of the container(s).
- 4) Ensures the condition of the container(s) is good.
- 5) Assure that the liner or container used to store the waste is not reactive with the waste stored (Appendix E).
- 6) Assure the container is closed during storage.

Areas that fall under the Satellite Accumulation definition include:

1. Paint Shop
2. Maintenance Building
3. Piedmont Machine Shop
4. Technical Services

Personnel using Satellite Accumulation areas will:

1. Maintain the storage area in a safe manner.
2. Adhere to the Pretransport requirements of COMAR 26.13.03.05.
3. Notify Environmental Services personnel if a pickup and transport of storage drums is needed before the designated pickup date.
4. Notify Environmental Services personnel if chemical composition of wastes stored in the salvage drum is changed.
5. Report spills and leaks immediately to the Environmental Services Group (Appendix H).

90 Day Storage - A 90 day storage area will (COMAR 26.13.03.05(E):

- 1) Limit accumulation time to 90 days or less. (Appendix F).
- 2) Clearly date each container with the beginning of each accumulation period.
- 3) Follow applicable pretransport requirements.
- 4) Follow appropriate storage and training requirements.

Areas that are 90 day storage areas include:

8 & 9 Quality Control Lab
Loading Dock
Armco Building

Personnel in the 8 & 9 Quality Control Lab and other areas will:

- 1) Maintain the storage area in a safe manner.
- 2) Keep a record of all waste that is put into the storage containers including the amount (in gallons), date/time and the initials of the responsible party (Appendix F).
- 3) Adhere to the Pretransport requirements of COMAR 26.13.03.05.
- 4) Notify Environmental Services personnel if a pickup and transport of storage drums is needed before the designated pickup date.

- 5) Notify Environmental Services personnel if chemical composition of wastes stored in the salvage drum is changed.
 - 6) Report spills and leaks immediately to the Environmental Services Group.
- (c). Yearly Checklist - Once per year the checklist in Appendix I will be reviewed.

2.2 Labeling and Marking

Labeling and Marking outlined in COMAR 26.13.03.05A, B, C, & D will be handled by authorized service firms prior to handling for off-site shipments. This will be done in accordance with 49 CFR 172.

2.3 Environmental Services Personnel Responsibilities

Environmental Services Personnel will:

- 1) Determine if waste is hazardous.
- 2) Obtain an EPA, WV, and MD ID number.
- 3) Maintain manifests of each shipment of hazardous waste in accordance with 26.13.03.04 and Westvaco's Record Retention Policy.
- 4) Retain a copy of each waste analysis report in accordance with 26.13.03.06A(3).
- 5) Complete the biennial report on waste activity consistent with 26.13.03.06(B) and fulfill any other reporting requirements of other states.
- 6) Monitor the solvents storage area and inspect site to insure compliance with storage and pretransport requirements.
- 7) Be responsible for scheduled pickup and disposal of hazardous wastes.
- 8) Act as liaison between regulatory agencies, Westvaco Corporation, and contractors.

The Environmental Manager will:

- 1) Audit manifests, annual reports, and waste analysis records to ensure that all are kept in accordance with 26.13.03.
- 2) Periodically inspect the site and initiate any needed corrective action.

2.4 Transport/Storage/Disposal Responsibilities

Contractors will:

- 1) Provide transportation and disposal of accumulated wastes from the areas in 2.1b.
- 2) Adhere to Department of Transportation Regulations concerning the shipment of hazardous wastes/substances.
- 3) Adhere to the Resource Conservation and Recovery Act Regulations.
- 4) Adhere to COMAR 26.13.03-26.13.05, as they apply.

2.5 Solvent Recycling

The mill uses a vendor to maintain parts washer systems. The vendor does periodic testing of these waste streams to verify categorization waste. The vendor determines when the solvents are ready for replacement, replaces the solvent, properly labels and readies the solvents for transport, transports, and finally recycles the waste solvents. Mill personnel do not handle the waste solvents except for fork lift operators who move the solvent containers within the mill to the vendors vehicles.

2.6 Training

Annual training is provided to all mill personnel who deal or work with hazardous wastes, including personnel from the following areas:

Maintenance	Main Lab
8&9 Control Lab	Paint Shop
Purchasing	Roll Finishing
Fork Lift Oper.	Management
Environmental Services	Emergency Personnel

Training includes:

- Review of Quality Assurance Plan
- Review of Emergency Disaster Response Manual
- Regulations
- Any training required specific to the work responsibilities of each individual.

New employees receive training as required within six months of their hire date. Records of training are kept in the Environmental Service files. The records include:

- Employee name
- Job title and description including requisite skills, education, and duties.
- Description of training required.

2.7 Containers

All containers used for hazardous waste storage must:

- Be in good condition (no rust, leaking, damage)
- Must be compatible with the waste being contained (Appendix E)
- Be kept closed during storage
- Be inspected weekly (Appendix G)
- If holding reactive or ignitable waste, must be at least 50 feet within the property line.

All containers used for shipping must meet 40 CFR Part 178 standards.

2.8 Spill Event Log (see Appendix H)

3. UNIVERSAL WASTES

No more than 5,000 kg of Universal wastes will be collected on-site at one time. Accumulation time will be less than one year.

3.1 Waste Batteries

- Waste batteries will be collected for recycling at the designated battery storage areas. This includes:
 1. Battery Shop - Batteries will be stored on wooden pallets or containment trays.
 2. Savage Garage - Batteries will be stored in the battery storage poly safety pack.
- Batteries will be transported off-site to be recycled.
- Broken batteries are a hazardous waste and will be put in a 90 day storage area.

3.2 Spent Fluorescent Bulbs and Ballasts

- Spent fluorescent bulbs and ballasts will be collected for recycling at the designated collection areas.
 1. 8 & 9 train loading dock
 2. No. 5 Paper Machine building

3. Tech Service building
- Safety Kleen will pick up the spent fluorescent bulbs and ballasts approximately every 60 days.

4. QUALITY ASSURANCE

Key QA personnel assigned to the Hazardous Waste Project are:

Technical Director, Westvaco Corporation
Representatives of Transporter/Disposal firms
Environmental Manager, Westvaco Corporation
Environmental Engineer, Westvaco Corporation
QC Lab Supervisor, Westvaco Corporation
Multi-Craft Foreman, Westvaco Corporation
Roll Finishing Supervisor, Westvaco Corporation.

Westvaco will revise this QA Plan as required and be responsible for revision and distribution of those revisions to personnel holding Hazardous Waste Quality Assurance Plans.

4.1 Service Control

Transporter/Disposal Firms will conduct regular pickups and disposal of 55-gallon drums of our various wastes. Manifests will be completed and retained. If an emergency pickup of ink solvents is necessary, the QC Lab will contact the Environmental Services Group and the Environmental Engineer will contact the appropriate disposal firm.

4.2 Site Control

Area personnel will set up and maintain proper containers and labeling. Before transportation of hazardous waste, the following must be displayed on the drums:

“Hazardous Waste - Federal Law prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency, or the Maryland Office of Environmental Programs.”

(Generator's Name and Address)

(Manifest Document Number)

In addition, the date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container. Personnel (associated with 90 day storage areas) will also maintain the site with an appropriate secondary containment structure in accordance with 26.13.05.04, fulfill 26.13.05.10 (except .10c) and comply with COMAR 26.13.05.02, .03, .04.

4.3 Document Control

All supporting documents, including the Spill Contingency Plan, will be periodically updated. Copies of all manifests, audits, inspections, and annual reports will be maintained by the Environmental Services Group. A biennial report will be filed with the State of Maryland in accordance with 26.13.03.06(B). This Quality Assurance Plan will be reviewed and revised accordingly once per calendar year.

4.4 Audits

(a) Site Inspection

A weekly site inspection will be conducted by area personnel and/or Environmental Services personnel to ensure compliance with the provisions of this QA Plan. Site inspection shall include, but not be limited, to:

- 1) Secondary containment integrity check
- 2) Ensuring proper labels, placards, and markings are installed
- 3) Drum integrity check.

(See Appendix G)

Weekly inspection reports will be distributed to each area coordinator. In the event that the area should fail the inspection, the Environmental Manager will be notified and corrective action administered.

(b) Corrective Action

In the event that corrective action is taken for a hazardous waste spill, a report of the incident will be sent to the Environmental Manager at Westvaco and retained on file in the EMS file cabinet.

(See Appendix H)

(c) Document Audit

Once every calendar year, a document audit will take place to ensure that the manifests match the annual report and that the project has been properly documented. This audit will be conducted by the Environmental Services Group (Appendix I).

(d) Annual Review

Yearly audits will be made of the QA Plan and associated documentation. This will include reviewing shipping documents, waste descriptions, waste analysis, waste reduction, and training records. The Environmental Manager will document that this audit took place by signing the form found in Appendix I.

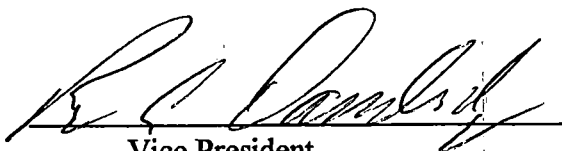
5. WASTE MINIMIZATION

The Luke mill routinely generates few types of Hazardous Wastes. These include degreasing solvents, paint thinners, and de-inking solvents. Other hazardous wastes we handle are usually on a one time basis. We continually examine routine wastes for ways to reduce or eliminate them. To achieve these goals, a separate waste minimization plan has been written. This plan is found in Appendix K.

6. IMPLEMENTATION

This plan is effective immediately. Supervisory personnel are responsible for properly instructing operating personnel in the operation and maintenance of equipment and facilities to prevent spills and to comply with applicable pollution control laws, rules, and regulations. Operating personnel will have the opportunity to receive annual training on regulations, this QA plan, and the Emergency Disaster Response Manual.

I have reviewed this plan and I will ensure that the necessary equipment and facilities are committed to prevent or contain any spills at Westvaco's Luke mill and that all regulations are complied with.



Vice President
Mill Manager

3-2-01
Date

APPENDIX:

A: Regulations

For detailed review, the following regulations can be found in the Environmental Manager's office in Technical Service.

Maryland:

COMAR Subtitle 13

- 26.13.01 Hazardous Waste Management System: General**
- .02 Identification & Listing of Hazardous Waste**
- .03 Standards Applicable to Generators of Hazardous Waste**
- .05.02G Personnel Training**
- .03 Preparedness & Prevention**
- .04 Contingency Plan & Emergency Procedures**
- .05 Record Keeping**
- .09 Use and Management of Containers**

West Virginia:

Code of State Rules, Chapter 20, Series 15 & 25.

Federal:

Resource Recovery and Conservation Act (RCRA)

Code of Federal Regulations (40 CFR Parts 260, 261, 262, 264, 265)

Department of Transportation (DOT)

Code of Federal Regulations (40 CFR Parts 171 - 173)

MeadWestvaco Corporation
300 Pratt Street
Luke, MD 21540-1099
tel 301-359-3311

Attachment 5 02-983

MeadWestvaco

February 25, 2002

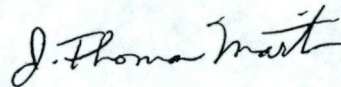
Maryland Department of the Environment
Hazardous Waste Program
2500 Broening Highway
Building 40, 2nd Floor
Baltimore, MD 21224

Dear Sirs:

Enclosed are RCRA Subtitle C Site Identification Form and Forms GM and OI of the 2001 Hazardous Waste Report for MeadWestvaco's Luke mill facility, EPA ID No. MDD 000 218 669. Also enclosed is a disk with the data generated by Waste Reporter 2001.

If you have any questions, please call me at 301-359-3311, Extension 3446.

Sincerely,



J. Thomas Martin
Environmental Engineer

JTM:slt
Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

bcc: R. Dandridge
R. Dickinson
J. King w/att.
R. Paugh
T. Peterman
R. Schmalz w/att.
G. Shoemaker w/att.
T. Smith
K. Wendell w/att.

MAIL THE COMPLETED FORM TO: The appropriate EPA Regional or State Office.		United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM	
1. Reason for Submittal (see instructions on page 10) CHECK CORRECT BOXES	A. Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste or used oil activities). <input type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #) <input checked="" type="checkbox"/> As a component of Hazardous Waste Report.		
2. Site EPA ID Number (see instructions on page 11)	EPA ID Number: MDD000218669		
3. Site Name (see instructions on page 11)	Site Name: MeadWestvaco / Luke Mill Facility		
4. Site Location Information (see instructions on page 11)	Street Address: 300 Pratt St.		State: MD
	City, Town or Village: Luke		Zip Code: 21540
	County Name: ALLEGANY		
5. Site Land Type (see instructions on page 11)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (see instructions on page 11)	A. 322121		B. 32211
	C.		D.
7. Site Mailing Address (see instructions on page 12)	Street or P.O. Box: SAME		
	City, Town or Village:		
	State:		
	Country:		Zip Code:
8. Site Contact Person (see instructions on page 12)	First Name: Thomas MI: J		Last Name: Martin
	Phone Number: 3013593311		Phone Number Extension: 3446
9. Legal Owner and Operator of the Site (see instructions on page 12 and 13)	Name of Site's Legal Owner: MeadWestvaco		Date Became Owner (mm/dd/yyyy): 01/30/2002
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Name of Site's Operator: Roger A. Dandridge		Date Became Operator (mm/dd/yyyy): 01/30/2002
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

EPA ID No. MDD000218669

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 13, 14, 15 and 16)**A. Hazardous Waste Activities****1. Generator of Hazardous Waste**

(choose one of the following three categories)

- ☒ a. LQG: Greater than 1000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- ☐ d. United States Importer of Hazardous Waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, check all that apply:

- ☐ 2. Transporter of Hazardous Waste
- ☒ 3. Treater, Storer or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- ☐ 4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
5. Exempt Boiler and/or Industrial Furnace
- ☐ a. Small Quantity On-Site Burner Exemption
- ☐ b. Smelting, Melting, Refining Furnace Exemption
- ☐ 6. Underground Injection Control

B. Universal Waste Activities**1. Large Quantity Handler of Universal Waste (refer to your State regulations to determine what is regulated). Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):**

	Generated	Accumulated
a. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities**1. Used Oil Transporter - Indicate type(s) of activity(ies)**

- ☐ a. Transporter
- ☐ b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)

- ☐ a. Processor
- ☐ b. Re-refiner

☐ 3. Off-Specification Used Oil Burner**4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)**

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (see instructions on page 16)**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

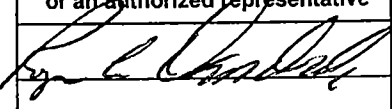
D001	D002	D006	D008	D009	D027	D039
D040	F003	F005				

EPA ID No. MDD000218669

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if needed for more waste codes.

12. Comments (see instructions on page 17)

13. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (see instructions on page 17)

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Roger A Dandridge, VP Luke Oper	02/25/2002

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669



FORM
GM

U.S. ENVIRONMENTAL
PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Used solvent from General Degreasing Parts Washers, Combustable, Petroleum				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
D039 NA					
NA NA NA					
D. Source Code (page 23)	G01	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25		W211		8,227.600000	1
			<input type="checkbox"/> Yes		Density
					<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)		
<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)		
ON-SITE PROCESS SYSTEM 1		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	
ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	PAD981736143	H141	8,227.600000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669



**FORM
GM**

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

2001 Hazardous Waste Report

**WASTE GENERATION
AND MANAGEMENT**

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Used cleaning solvent for removing gum and grease from metal parts, Flammable,				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
D006 D008 D027 D039 D040					
D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)	
G02				1	
Management Method Code for Source Code G25		W204	1,169.200000	Density	
		<input type="checkbox"/> Yes		<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2	Was any of this waste managed on-site? (page 24)	
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)		
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24) Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	PAD981736143	H141	1,169.200000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669



FORM
GM

U.S. ENVIRONMENTAL
PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Used Mineral Spirits from cleaning Painting Tools, Flammable Varsol				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
D001 NA					
NA NA NA					
D. Source Code (page 23)	G01	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25		W209	<input type="checkbox"/> Yes	154.100000	Density 1
					<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)		
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24) Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
<input type="checkbox"/> Yes (CONTINUE TO BOX B) <input checked="" type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Satellite Accumulation

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669



**FORM
GM**

**U.S. ENVIRONMENTAL
PROTECTION AGENCY**

2001 Hazardous Waste Report

**WASTE GENERATION
AND MANAGEMENT**

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) RQ Waste Paint Related Material				
B. EPA Hazardous Waste Codes (page 22) D001 F003 F005 NA NA		C. State Hazardous Waste Codes (page 22)			
D. Source Code (page 23) G06 Management Method Code for Source Code G25	E. Form Code (page 23) W209	F. RCRA Radioactive Mixed (page 23) <input type="checkbox"/> Yes	G. Quantity Generated in 2001 (page 22) 604.200000	H. UOM (page 23) 1 Density <input type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2	Was any of this waste managed on-site? (page 24) <input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)		Quantity treated, disposed or recycled on-site in 2001 (page 25)		On-site Management Method Code (page 24)
				Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26) <input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) KYD053348108	C. Off-site Management Method Code Shipped to (page 26) H061	D. Total quantity shipped in 2001 (page 26) 600.000000	
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)	

Comments:

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2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

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Sec. 1	A. Waste Description (page 22) Cleaning solvent - Ink Residue Waste from cleaning Printing Press, Flammable				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
F005 NA					
NA NA NA					
D. Source Code (page 23)	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)	
G01				1	
Management Method Code for Source Code G25			1,335.100000	Density	
W209		<input type="checkbox"/> Yes		<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2	Was any of this waste managed on-site? (page 24)	
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)		
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24) Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	KYD053348108	H061	1,243.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

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SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669



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U.S. ENVIRONMENTAL
PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Waste Flammable Liquids, n.o.s				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
D001 NA					
NA NA NA					
D. Source Code (page 23) G11 Management Method Code for Source Code G25		E. Form Code (page 23) W001	F. RCRA Radioactive Mixed (page 23) <input type="checkbox"/> Yes	G. Quantity Generated in 2001 (page 22) 60.000000	H. UOM (page 23) Density 1 <input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24) <input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)		On-site Management Method Code (page 24)
Quantity treated, disposed or recycled on-site in 2001 (page 25)		Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26) <input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) MDD980554653	C. Off-site Management Method Code Shipped to (page 26) H141	D. Total quantity shipped in 2001 (page 26) 60.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26) MIR000037309	C. Off-site Management Method Code Shipped to (page 26) H040	D. Total quantity shipped in 2001 (page 26) 60.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

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SITE NAME: MeadWestvaco / Luke Mill

EPA ID NO: MDD000218669



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U.S. ENVIRONMENTAL
PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1	A. Waste Description (page 22) Waste Phosphoric Acid				
B. EPA Hazardous Waste Codes (page 22)		D002 NA		C. State Hazardous Waste Codes (page 22)	
NA NA NA					
D. Source Code (page 23) G02 Management Method Code for Source Code G25		E. Form Code (page 23) W119	F. RCRA Radioactive Mixed (page 23) <input type="checkbox"/> Yes	G. Quantity Generated in 2001 (page 22) 150.000000	H. UOM (page 23) Density 1 <input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24) <input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> No (SKIP TO SEC. 3)	
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	On-site Management Method Code (page 24) Quantity treated, disposed or recycled on-site in 2001 (page 25)

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26) <input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)		
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26) MDD980554653	C. Off-site Management Method Code Shipped to (page 26) H141	D. Total quantity shipped in 2001 (page 26) 150.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26) TXD055141378	C. Off-site Management Method Code Shipped to (page 26) H040	D. Total quantity shipped in 2001 (page 26) 150.000000
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments: Acid cleaning

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EPA ID NO: MDD000218669



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U.S. ENVIRONMENTAL
PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

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Sec. 1	A. Waste Description (page 22) RQ Hazardous Waste solid, n.o.s.				
B. EPA Hazardous Waste Codes (page 22)		C. State Hazardous Waste Codes (page 22)			
D009 NA					
NA NA NA					
D. Source Code (page 23)	G15	E. Form Code (page 23)	F. RCRA Radioactive Mixed (page 23)	G. Quantity Generated in 2001 (page 22)	H. UOM (page 23)
Management Method Code for Source Code G25		W002	<input type="checkbox"/> Yes	480.000000	1
					Density <input type="checkbox"/> lbs/gal <input type="checkbox"/> sg

Sec. 2	Was any of this waste managed on-site? (page 24)	
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)		
<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)		
ON-SITE PROCESS SYSTEM 1		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	
ON-SITE PROCESS SYSTEM 2		
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3	A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)		
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	PAD987367216	H010	480.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

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EPA ID NO: MDD000218669



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GM

U.S. ENVIRONMENTAL
PROTECTION AGENCY

2001 Hazardous Waste Report

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1 A. Waste Description (page 22)							
Waste Mercury - contained in Manufactured Product							
B. EPA Hazardous Waste Codes (page 22)				C. State Hazardous Waste Codes (page 22)			
D009 NA							
NA NA NA							
D. Source Code (page 23)		E. Form Code (page 23)		F. RCRA Radioactive Mixed (page 23)		G. Quantity Generated in 2001 (page 22)	
G15		W320				5,090.000000	
Management Method Code for Source Code G25				<input type="checkbox"/> Yes		H. UOM (page 23) 1 Density	
						<input type="checkbox"/> lbs/gal <input type="checkbox"/> sg	

Sec. 2 Was any of this waste managed on-site? (page 24)			
<input type="checkbox"/> Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)			
<input checked="" type="checkbox"/> No (SKIP TO SEC. 3)			
ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)		On-site Management Method Code (page 24)	
Quantity treated, disposed or recycled on-site in 2001 (page 25)		Quantity treated, disposed or recycled on-site in 2001 (page 25)	

Sec. 3 A. Was any of this waste shipped off-site in 2001 for treatment, disposal or recycling? (pages 25 and 26)			
<input checked="" type="checkbox"/> Yes (CONTINUE TO BOX B) <input type="checkbox"/> No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
	PAD987367216	H010	5,090.000000
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2001 (page 26)

Comments:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103**

COMPLIANCE INSPECTION REPORT

1. GENERAL INFORMATION

Inspection Date: October 26 thru 27, 1998

Company Name: Westvaco Corporation

Address: 300 Pratt Street
Luke, Maryland

Contact: Mr. George H. Shoemaker,
Environmental Manager

Telephone: 301-359-1099

Company Personnel/Title or Area of Responsibility:

George H. Shoemaker, Environmental Manager
Robert Dickinson, Vice President Corporate Environmental Safety & Health
Kenneth Wendell, Technical Director
George Martin, Production Manager
James Taylor, Superintendent for the Upper Potomac River Commission

State Personnel/Title:

Dave Fluke, Inspector MDE (NPDES Permits)
John Cook, Inspector MDE (NPDES)
Mitchell Welch, Inspector MDE (Solid Waste)
P. K. Kadakia, Engineer MDE

EPA Personnel/Title:

Zelma Maldonado, Environmental Engineer
Garth Connor, Environmental Scientist
Paul Dressel, Environmental Engineer
Craig Chomiak, SAIC, Environmental Scientist, Sampling Leader

Arrival Time: 9:00 am 2/26/1998 (Credentials shown to: Mr. Shoemaker)

Departure Time: 12:20 p.m. 2/27/1998

Inspection Report Prepared by: Paul G. Dressel *PGD 2/27/98*

2. TYPE OF FACILITY

The Westvaco Luke Mill (Westvaco) produces magazine grade paper. Westvaco operates a pulp plant, bleaching and paper machines. Westvaco has about 1750 employees and operates on a 24 hour basis, seven days a week.

3. PRE-INSPECTION MEETING

We introduced ourselves and presented our credentials. Ms. Maldonado explained that we were at Westvaco to conduct compliance inspections of the National Pollutant Discharge Elimination System (NPDES) and the Resource Conservation and Recovery Act (RCRA) programs. Our compliance inspection at this time would include a review of the documentation of records that are required under the NPDES and RCRA, screening of other environmental statutes, and a site inspection. We notified Westvaco that the EPA contractor was here to determine requirements to conduct sampling of the NPDES outfalls, and they would collect the samples the following week.

Mr. Wendell proceeded to present an overall description of the facility operations. The presentation included compliance methods and the associated monitoring requirements. Westvaco's process wastewater is treated at an offsite wastewater treatment plant before discharge to the stream to meet NPDES requirements. The main wastewater streams are generated by the Paper Machines, and the Pulping and Bleach plants.

Westvaco is a large quantity generator of Hazardous Wastes. The majority of the hazardous waste generated at the facility is paint waste, spent solvent and blast grit. The facility has three less than ninety day storage areas and four satellite accumulation areas.

4. FACILITY TOUR

At approximately 1:00pm, the EPA team began a tour through the facility. The facility tour consisted of a walk through in order to (1) survey sampling locations and (2) observe condition of permitted outfalls and observe location of the Hazardous waste storage areas, maintenance shop, and the UPRC waste water treatment plant.

5. NPDES PROGRAM INSPECTION

A BACKGROUND

The current NPDES permit (Permit No. MD0002658) was renewed on August 1, 1990 and expired on August 1, 1995. A new permit has not been issued at this time. The conditions specified by the expired permit are currently in effect and are the following:

Outfall 001, 002, 004, 005 and 006 for the discharge of non-contact cooling water

Effluent characteristics	Effluent limitations		Monitoring requirements	
	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Flow	gpd ¹	gpd	1/week	estimated
Temperature	N/A	130°F	1/quarter	I-s

PH= 6.5>PH<8.5

I-s = immersion stabilization

No foam or floating solids

Outfall 003 for the discharge of Fly Ash and Bottom Ash transport water, uncontaminated storm water, lime kiln scrubbing water and filter backwash water

Effluent characteristics	Effluent limitations				Monitoring requirements	
	Monthly Ave	Daily Max	Month Ave	Day Max	Measurement Frequency	Sample Type
Flow (mgd)	N/A	N/A	²	²	continuous	24 hr comp
TSS	950 lbs/day	4,300 lbs/day	²	²	1/day	24 hr comp
Dissolved Aluminum	N/A	N/A	quart ave ²	²	1/month	24 hr comp
Oil and grease	N/A	N/A	15mg/l	20mg/l	1/month	ave of 3 grabs

PH=6.5>PH<8.5

No foam or floating solids

¹Monitor without limits

²Monitor without limitations

Industrial process effluents are discharged to the Upper Potomac River Commission (UPRC). The UPRC has a NPDES discharge permit MD0002658. UPRC has not required a pre-treatment permit from Westvaco.

Outfall 003 discharges the water contained in a fly-ash lagoon of approximately 2 to 3 acres of surface area. The sediments deposited at the bottom are dredge and sent to a landfill. Special condition D of the currently effective NPDES permit requires, that for any sludges or solid waste removed, Westvaco shall provide:

- (1) location map for disposal of waste
- (2) identify physical, chemical and biological characteristics of waste and identify disposal method
- (3) if disposal is handled by 3rd party identify the 3rd party and provide the above info.

B FIELD INSPECTION

October 26, 1998

Outfall 005- This outfall is located upstream of the main facility. It is immediately upstream to the mill dam in the Potomac River. Water discharged from this outfall is non-contact cooling water. The discharge recirculates the flow back to the dam above the intake located right downstream of the dam. Water flow from this outfall is about 10 million gallons/day.

Outfall 004- This outfall can be seen from one of the bridges used by the facility. It discharges non contact water from the evaporators used in the black liquor recovery operation into the North Branch Potomac river.

Outfall 006- This outfall was sealed. This discharge was used occasionally during facility shutdowns for the maintenance of the cooling towers. Westvaco eliminated these shutdowns therefore the need for this outfall.

Outfall 003- This outfall is located across the river from the facility. The pipeline that discharges this effluent is located about 3/4 into the North Branch Potomac river. The discharge contains the overflow from the fly-ash lagoon. According to facility representative, the lagoon is used solely for coal fly-ash from power generation. The lagoon was being dredged at the time of the inspection. Facility representatives said that the lagoon is dredged on a continuous basis.

Outfall 002- This outfall discharges water used in the cooling process for the production of Chloride Dioxide (ClO_2).

Outfall 001- This outfall discharges water used in the turbine condensers for power generation.

Storm water Outfalls

- Savage Wood Yard - Vehicle maintenance operations occur in this area. Two separate storm water outfalls discharge into the Savage river from this area. No discharge was seen at the time of the inspection. However, SAIC was instructed to collect samples if a discharge was observed during the sampling field activities.
- Beryl Woodyard - Wood chips are generated in this area. The operation is mostly dry, however, some water goes to a storm water drain which leads into the Montgomery Run in Beryl, WV. SAIC was instructed to collect samples of this location, if enough water could be collected. Westvaco has applied for a permit from the West Virginia state for this storm water outfall. According to Westvaco representatives, this drains will be collected and conveyed to UPRC in the future.

UPRC's Outfall 001 - This outfall uses a submerged pipeline with a five point diffuser that discharges into the center of the North Branch Potomac river. The UPRC outfall treats mostly industrial wastewater from Westvaco. The average flow from Westvaco is 20,000,000 gallons per day.

October 27, 1998

We inspected the pulping plant operation, escorted by Mr. Bill Hoffman. Pulping occurs in twelve (12) batch digesters with a 21/2 hours of operation per digester and approximately 980 tons per day production. Each digester holds about 30 tons of wood chips. In case of failure, any digester can be taken out of service and continue digestion with the remaining units. Knots or undigested chips are sent back for redigestion. All wastewater in this process is reused. Wastewater is called brown stock and is concentrated in a series of evaporator stages in to black liquor. The black liquor is burned for power and for chemical recovery. The black liquor is all stored in tanks prior to recovery.

Afterward, we visited the bleaching operations. Westvaco's bleaching plant processes two distinct separate bleaching lines (1) hardwood and (2) pine wood. Westvaco uses Elemental Chlorine Free (ECF) bleaching. All filtrates from the washing of the bleached pulp are collected in a 10,000 gallon holding tank and sampled prior to discharging it to UPRC. Sampling parameters include dioxins and Ph.

We proceeded to visit the Chlorine dioxide manufacturing area. Chlorine dioxide is manufactured in this are using Sodium Chloride, Sulfuric Acid and Methanol. Wastewater from this process is sampled for dioxide and sent to UPRC. Water used in the cooling of this process is discharged via outfall 002.

C FILE REVIEW

As part of the NPDES inspection the following documents were reviewed at the facility:

Spill records for 1997 and 1998
Records of water withdrawal for 1991 and 1998
Effluent flow to UPRC for October 6, 1998, October 13, 1998 and October 20, 1998.

6. RCRA PROGRAM INSPECTION

A BACKGROUND

Westvaco is a large quantity generator. The majority of the hazardous waste generated at the facility is paint waste, spent solvent and blast grit. The facility has three less than ninety day storage areas and four satellite accumulation areas.

B FIELD INSPECTION

The field inspection included all four satellite accumulation areas and the three 90 day storage areas.

8 & 9 Press Room - 90 Day Storage Area - Manufactured Storage unit. One drum of ink, paint waste and spent toluene solvent. Drum was labeled, covered, closed with start date of 10/2/98. Storage unit was secured.

Paint Shop Satellite Accumulation Area - One drum of petroleum Naptha. Drum was covered and closed.

Roll Grinding Shop Satellite Accumulation Area - One drum covered and closed.

Roll Grinding Shop - 90 Day Storage Area - Manufactured Unit. One drum labeled, contents unknown awaiting lab results. Dated 10/24/98. Content were thought to be oil/grease. Second drum labeled, contents unknown awaiting lab results. Dated 10/24/98. Content were thought to be waste oil. Third container, 5 gallon bucket containing waste ink. Dated 10/24/98. All containers closed and covered. Storage unit was secured.

Warehouse Satellite Accumulation Area - One drum covered and closed.

Savage Woodyard - 90 Day Storage Area One 5 gallon bucket container of mercury waste, Lab Pack. Dated 09/16/98. The Area was secured.

Pipe Shop Satellite Accumulation Area - Three drums waste oil, covered and closed.

C FILE REVIEW

EPA reviewed hazardous waste manifests for calendar years 1996 through 1998, personnel training records, and the contingency plan.

7. POST INSPECTION MEETING

Westvaco has requested copy of this inspection report.

Change contact
Put in owners address

RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM
MAINTENANCE FORM FOR EPA NOTIFICATION

EPA-ID# MD1010101211816191 Date: 5-17-93

FACILITY NAME Wesvaco Corp

New Facility Name

Name Change _____

Location of Installation

Street _____

City/Town _____ State _____ Zip _____

County Code _____ County Name _____

Installation Mailing Address

Street _____

City/Town _____ State _____ Zip _____

Installation Contact

Last Name Shoemaker First George

Job Title Environmental Mgr. Phone # _____

Street _____

City/Town _____ State _____ Zip _____

Ownership

Name of Legal Owner _____

Street 299 Park Ave

City/Town New York State NY Zip 10171

Phone # (212) 688-5000 Land Type _____ Owner Type _____

Waste Codes

Delete Old Waste Codes

Add New Waste Codes


D004 D009 D040 F005 MX01
D006 D018 F002 P120
D008 D029 F003 M001

Updated in RCRIS by ATR/Bdm Date 5/19/93

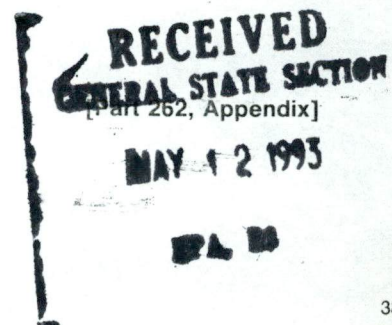
Waste Activity	Type	RCRA Reg. Status	RCRA Reg. Desc.
Generator	_____	_____	_____
TSD	_____	_____	_____
Transporter	_____	_____	_____
Mode of Transportation:	_____	_____	_____
Air _____ Rail _____ Highway _____ Water _____ Other _____			
Burner/Blender	B Boiler and/or Industrial Furnace (BIF) only. D BIF only; Smelter Deferral. E BIF only; Small Quantity Exemption claimed. N Not a Burner/Blender, Verified. X Other Burner/Blender Activity. Blank Unverified.		
HWF Market to Burner	X Code indicates that the handler is a generator engaged in marketing to burners of hazardous waste fuel activities. Blank No activity.		
HWF Other Market	X Code indicates that the Handler is engaged in hazardous waste fuel marketing activities other than generator marketing to burner.		
HWF Burner	B Boiler and/or Industrial Furnace. X Indication of activity.		
OSO Market to Burner	X Code indicates that the handler is a generator engaged in marketing to burners of off-spec. used oil fuel.		
OSO Other Market	X Code indicates that the Handler is engaged in marketing of off-spec. used oil fuel other than generator marketing to burner (e.g., marketing to used oil refinery).		
OSO Burner	B Boiler and/or Industrial Furnace. X Indication of Activity.		
SO ACT: _____	Code indicating that the handler is engaged in marketing of specification fuel oil activities. B Boiler and/or Industrial Furnace. X Indication of Activity.		
Burner Types	Utility Boiler _____ Industrial Boiler _____ Ind. Furnace _____		
Underground Injection Control	X Code indicates that the Handler generates and/or treats, stores, or disposes of hazardous waste and has an injection well located at the installation.		
Recycler: _____	C Commercial R Non-Commercial Recycler N Not a Recycler, Verified Blank Not a recycler, unverified.		

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-92
GSA No. 0246-EPA-OT

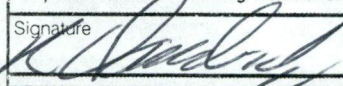
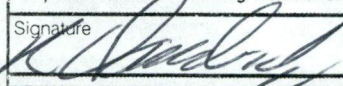
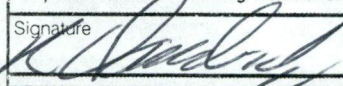
Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).		 Notification of Regulated Waste Activity United States Environmental Protection Agency		Date Received (For Official Use Only)	
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)					
<input type="checkbox"/> A. First Notification		<input checked="" type="checkbox"/> B. Subsequent Notification (complete item C)		C. Installation's EPA ID Number M D D 0 0 0 2 1 8 6 6 9	
II. Name of Installation (Include company and specific site name) W E S T V A C O C O R P L U K E M D					
III. Location of Installation (Physical address not P.O. Box or Route Number)					
Street 3 0 0 P R A T T S T					
Street (continued)					
City or Town L U K E					
State M D		ZIP Code 2 1 5 4 0 -			
County Code 0 0 1		County Name A L L E G A N Y			
IV. Installation Mailing Address (See instructions)					
Street or P.O. Box S A M E					
City or Town State ZIP Code					
V. Installation Contact (Person to be contacted regarding waste activities at site)					
Name (last) S H O E M A K E R			(first) G E O R G E		
Job Title E N V I R O N M E N T A L M G			Phone Number (area code and number) 3 0 1 - 3 5 9 - 3 3 1 1		
VI. Installation Contact Address (See instructions)					
A. Contact Address Location Mailing <input checked="" type="checkbox"/>		B. Street or P.O. Box			
City or Town State ZIP Code					
VII. Ownership (See instructions)					
A. Name of Installation's Legal Owner W E S T V A C O C O R P O R A T I O N					
Street, P.O. Box, or Route Number 2 9 9 P A R K A V E					
City or Town State ZIP Code N Y 1 0 1 7 1 -					
Phone Number (area code and number) 2 1 2 - 6 8 8 - 5 0 0 0		B. Land Type P		C. Owner Type P	
D. Change of Owner Indicator Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		(Date Changed) Month Day Year			

EPA Form 8700-12 (Rev. 9-92) Previous edition is obsolete.



Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-92
GSA No. 0246 EPA OT

ID - For Official Use Only																	
VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)																	
A. Hazardous Waste Activity 1. Generator (See Instructions) <input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.) 2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify _____ <input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions. 4. Hazardous Waste Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketers <input type="checkbox"/> c. Boiler and/or Industrial Furnace <input type="checkbox"/> 1. Smelter Deferral <input type="checkbox"/> 2. Small Quantity Exemption Indicate Type of Combustion Device(s) <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input type="checkbox"/> 5. Underground Injection Control	B. Used Oil Fuel Activities 1. Off-Specification Used Oil Fuel <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device <input type="checkbox"/> 1. Utility Boiler <input type="checkbox"/> 2. Industrial Boiler <input type="checkbox"/> 3. Industrial Furnace <input checked="" type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification																
IX. Description of Regulated Wastes (Use additional sheets if necessary)																	
A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24) <table style="width: 100%;"><tr><td>1. Ignitable (D001)</td><td>2. Corrosive (D002)</td><td>3. Reactive (D003)</td><td>4. Toxicity Characteristic (D000)</td><td>D009</td><td>D018</td><td>D039</td><td>D040</td></tr><tr><td><input checked="" type="checkbox"/></td><td><input checked="" type="checkbox"/></td><td><input type="checkbox"/></td><td><input checked="" type="checkbox"/></td><td>D 0 0 4</td><td>D 0 0 6</td><td>D 0 0 7</td><td>D 0 0 8</td></tr></table> (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))		1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	D009	D018	D039	D040	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	D 0 0 4	D 0 0 6	D 0 0 7	D 0 0 8
1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	D009	D018	D039	D040										
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	D 0 0 4	D 0 0 6	D 0 0 7	D 0 0 8										
B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.) <table style="width: 100%; text-align: center;"><tr><td>1 F 0 0 1</td><td>2 F 0 0 2</td><td>3 F 0 0 3</td><td>4 F 0 0 5</td><td>5 P 1 2 0</td><td>6 U 2 2 6</td></tr><tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td></tr></table>		1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 5	5 P 1 2 0	6 U 2 2 6	7	8	9	10	11	12				
1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 5	5 P 1 2 0	6 U 2 2 6												
7	8	9	10	11	12												
C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.) <table style="width: 100%; text-align: center;"><tr><td>1 M 0 0 1</td><td>2 M X 0 1</td><td>3</td><td>4</td><td>5</td><td>6</td></tr></table>		1 M 0 0 1	2 M X 0 1	3	4	5	6										
1 M 0 0 1	2 M X 0 1	3	4	5	6												
X. Certification I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. <table style="width: 100%;"><tr><td style="width: 33%;">Signature </td><td style="width: 33%;">Name and Official Title (type or print) Roger Dandridge, Vice-Pres.</td><td style="width: 33%;">Date Signed 4-22-93</td></tr></table>		Signature 	Name and Official Title (type or print) Roger Dandridge, Vice-Pres.	Date Signed 4-22-93													
Signature 	Name and Official Title (type or print) Roger Dandridge, Vice-Pres.	Date Signed 4-22-93															
XI. Comments ATK/Bdk 5/19/93																	
Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)																	

EPA Form 8700-12 (Rev. 9-92) Previous edition is obsolete.

[Part 262, Appendix]

Westvaco

April 15, 1993

RECEIVED

APR 27 1993

HAZARDOUS WASTE DIVISION

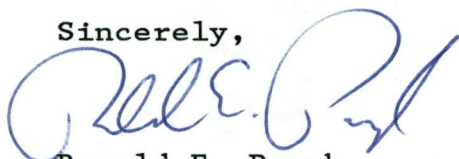
Maryland Department of the Environment
Hazardous Waste Program
2500 Broening Highway
Building 40, 2nd Floor
Baltimore, MD 21224

Dear Sirs:

Enclosed is EPA Form 8700-12, Notification of Regulated Waste Activity. The updated form is being submitted to update your files on hazardous waste activities taking place at this facility. The wastes listed include those currently being generated at the mill, as well as any one-time generation in the past.

If you require further information, please contact me at (301) 359-3311.

Sincerely,



Ronald E. Paugh
Senior Project Engineer

REP:ss
Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

11

11/11/11
11/11/11

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Westvaco

April 15, 1993

RECEIVED

APR 27 1993

HAZARDOUS WASTE DIVISION

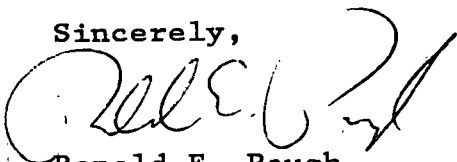
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Sincerely,



Ronald E. Paugh
Senior Project Engineer

REP:ss
Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0028 Expires 9-30-92
GSA No. 0246-EPA-01

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of
Regulated Waste
ActivityDate Received
(For Official Use Only)

United States Environmental Protection Agency

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. First Notification☒ B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

M D D 0 0 0 2 1 8 6 6 9

II. Name of Installation (Include company and specific site name)

W E S T V A C O C O R P L U K E M D

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

3 0 0 P R A T T S T

Street (continued)

City or Town

L U K E

State

ZIP Code

M D 2 1 5 4 0 -

County Code

County Name

0 0 / A L L E G A N Y

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

S H O E M A K E R

(first)

G E O R G E

Job Title

E N V I R O N M E N T A L M G

Phone Number (area code and number)

3 0 1 - 3 5 9 - 3 3 1 1

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing☒

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

W E S T V A C O C O R P O R A T I O N

Street, P.O. Box, or Route Number

2 9 9 P A R K A V E

City or Town

N E W Y O R K

State

ZIP Code

N Y 1 0 1 7 1 -

Phone Number (area code and number)

2 1 2 - 6 8 8 - 5 0 0 0

B. Land Type

P

C. Owner Type

P

D. Change of Owner
Indicator

Yes

No ☒

(Date Changed)

Month

Day

Year

EPA Form 8700-12 (Rev. 9-92) Previous edition is obsolete.

RECEIVED
CENTRAL STATE SECTION
(Part 262, Appendix)

MAY 12 1993

EPA 12

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2050-0028 Expires 9-30-92
GSA No. 0245 EPA 01

ID - For Official Use Only																			
VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)																			
<p style="text-align: center;">A. Hazardous Waste Activity</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>1. Generator (See instructions)</p> <p><input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify _____</p> </div> <div style="width: 45%;"> <p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketer</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter Refractor</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p> </div> </div>	<p style="text-align: center;">B. Used Oil Fuel Activities</p> <p><input type="checkbox"/> 1. Off-Specification Used Oil Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketer</p> <p><input type="checkbox"/> c. Burner - indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input checked="" type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification</p>																		
IX. Description of Regulated Wastes (Use additional sheets if necessary)																			
<p>A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles (See 40 CFR Parts 261.20 - 261.24)</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 40%;"> <p>1. Ignitable (D001) <input checked="" type="checkbox"/></p> <p>2. Corrosive (D002) <input checked="" type="checkbox"/></p> <p>3. Reactive (D003) <input type="checkbox"/></p> <p>4. Toxicity Characteristic (D000) <input checked="" type="checkbox"/></p> </div> <div style="width: 60%;"> <p>D009 D018 D039 D040</p> <p>(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))</p> <p>D 0 0 4 D 0 0 6 D 0 0 7 D 0 0 8</p> </div> </div>																			
<p>B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 16.6%;">1 F 0 0 1</td> <td style="width: 16.6%;">2 F 0 0 2</td> <td style="width: 16.6%;">3 F 0 0 3</td> <td style="width: 16.6%;">4 F 0 0 5</td> <td style="width: 16.6%;">5 P 1 2 0</td> <td style="width: 16.6%;">6 U 2 2 6</td> </tr> <tr> <td>7</td> <td>8</td> <td>9</td> <td>10</td> <td>11</td> <td>12</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </table>		1 F 0 0 1	2 F 0 0 2	3 F 0 0 3	4 F 0 0 5	5 P 1 2 0	6 U 2 2 6	7	8	9	10	11	12						
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7	8	9	10	11	12														
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1 M 0 0 1	2 M X 0 1	3	4	5	6														
<p>X. Certification</p> <p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>Signature: </p> </div> <div style="width: 40%;"> <p>Name and Official Title (type or print) Roger Dandridge, Vice-Pres.</p> </div> <div style="width: 30%;"> <p>Date Signed 4-22-93</p> </div> </div>																			
<p>XI. Comments</p> <p>ATK/Bdk 5/19/93</p>																			
<p>Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)</p>																			

EPA Form 8700-12 (Rev. 9-92) Previous edition is obsolete.

[Part 262, Appendix]